



EXHIBIT B

INVOICE

OVB Law & Consulting, S.C.

826 N Plankinton Ave, Suite 600
Milwaukee, Wisconsin 53203
Phone: 414-585-0588
Fax: 414-255-3031
Email: emil@ovblaw.com
www.ovblaw.com

Invoice # 3363
Date: 12/14/2023
Due On: 12/24/2023

Joseph Walker
1008 S 22nd St., Apt. 1
Milwaukee, WI 53204
414-234-2402

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Outstanding
(\$0.00	+ \$278,241.70)-(\$0.00	= \$278,241.70

Please make all amounts payable to: OVB Law & Consulting, S.C.

07003-Walker v City of Milwaukee-Walker

Walker v City of Milwaukee

Services

Date	Type	Description	Quantity	Attorney	Rate	Total
01/26/2022	Service	A108 Communicate (other external) L110 Fact Investigation/Development: Initial call with OC re status of litigation, outstanding discovery, and potential for amending scheduling order.	0.20	SHB	\$275.00	\$55.00
03/14/2022	Service	A103 Draft/revise P400 Initial Document Preparation/ Filing: Draft status update to client regarding deadline extensions for discovery and dispositive motions	0.20	AB	\$120.00	\$24.00
03/14/2022	Service	Review discovery summaries; Review draft status correspondence to client	1.50	OEO	\$300.00	\$450.00
03/14/2022	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend video/Zoom status conference re	0.30	SHB	\$275.00	\$82.50

		discovery and dispositive motion extensions.				
03/14/2022	Service	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Revise status letter to client and email to client	0.10	SHB	\$275.00	\$27.50
03/14/2022	Service	A104 Review/analyze L310 Written Discovery: Begin to review City's production and create discovery summary	0.70	SHB	\$275.00	\$192.50
05/02/2022	Service	A104 Review/analyze P300 Structure/Strategy/Analysis: Reviewed all police reports in the Bates file. Drafted discovery template focusing on inconsistencies within reports. Determining which officers are appropriate for depositions.	5.00	AB	\$250.00	\$1,250.00
05/03/2022	Service	A103 Draft/revise P300 Structure/Strategy/Analysis: Reviewed all CAD reports and updated discovery template. Searched through discovery. Read emails from Attorney Huddleston regarding discovery requests. Drafted an email to Asst. City Attorney Anthony Jackson in regards to missing discovery. Corresponded with Austin to get a copy of Plaintiff's First Set of Written Interrogatories, Demand for Production of Documents, and Request for Admissions from Mr. Walker. Sent email to Asst. City Attorney Anthony Jackson.	6.50	AB	\$250.00	\$1,625.00
05/03/2022	Service	A103 Draft/revise P300 Structure/Strategy/Analysis: Reviewed analysis and summaries of all CAD reports, and discovery documents provided by client and the city defendants to begin formulating case strategy and discovery plan	3.40	OEO	\$300.00	\$1,020.00
05/04/2022	Service	A103 Draft/revise P400 Initial Document Preparation/ Filing: Proof and finalize correspondence to City Attorney regarding missing discovery documents and deposition dates	0.40	AB	\$120.00	\$48.00
05/11/2022	Service	A110 Manage data/files L140 Document/File Management: Download videos of Luan Will interviews, save and send off to Attys. for review.	0.30	AB	\$120.00	\$36.00
05/11/2022	Service	A103 Draft/revise L210 Pleadings: Draft Joint Motion to Vacate Amended Scheduling Order	0.40	JO	\$120.00	\$48.00
05/16/2022	Service	A107 Communicate (other outside counsel) C300 Analysis and Advice: Spoke to Brian Landers in regards to being an expert for the Excessive Use of Force claim. Drafted email to Attorney Huddleston regarding the conversation. Emailed Brian Landers for his contract and additional information.	0.50	AB	\$250.00	\$125.00
05/18/2022	Service	A103 Draft/revise L320 Document Production: Draft shell response to plaintiff's first set of interrogatories and requests for production.	1.00	JO	\$120.00	\$120.00
05/23/2022	Service	A103 Draft/revise L210 Pleadings: Draft Notice of	0.10	AB	\$120.00	\$12.00

Appearance for Attorney Allysa Brown						
05/23/2022	Service	A104 Review/analyze L130 Experts/Consultants: Review and analyze documents provided by Client for expert review.	3.50	JO	\$120.00	\$420.00
05/23/2022	Service	Client Meeting: Met with Client to discuss interrogatory responses.	0.50	AB	\$250.00	\$125.00
05/24/2022	Service	A108 Communicate (other external) L390 Other Discovery: Finalize Deposition Notices for Balbir Mahay and Jeremy Gonzalez. Send to Court Reporter and Send to Attorney Jackson	0.50	AB	\$120.00	\$60.00
05/24/2022	Service	A103 Draft/revise C100 Fact Gathering: Draft Authorization letter to Hoglund Law in order to obtain Client's disability file for further fact investigation.	0.30	JO	\$120.00	\$36.00
05/24/2022	Service	A104 Review/analyze L110 Fact Investigation/Development: Review and analyze documents for further expert review.	2.50	JO	\$120.00	\$300.00
05/24/2022	Service	A103 Draft/revise L390 Other Discovery: Draft medical records requests to healthcare providers Walker has seen since 2014	2.00	AB	\$120.00	\$240.00
05/25/2022	Service	A108 Communicate (other external) L310 Written Discovery: Send out medical records requests and authorizations to health care providers and correctional institutions.	1.50	AB	\$120.00	\$180.00
05/26/2022	Service	A110 Manage data/files L340 Expert Discovery: Compile documents and review documents that would be pertinent for expert, compile into Dropbox folder and send to expert for review. Send email to expert with specific deadlines for expert report.	4.00	AB	\$120.00	\$480.00
05/27/2022	Service	A104 Review/analyze C100 Fact Gathering: Reviewed April 25, 2022, videos of Luann Will and created document analyzing statements.	1.50	AB	\$250.00	\$375.00
06/03/2022	Service	A106 Communicate (with client) L330 Depositions: 6/3 Call to Walker re Deposition Dates Availability	0.10	AB	\$120.00	\$12.00
06/03/2022	Service	A103 Draft/revise L110 Fact Investigation/Development: Draft and revise Authorization to Release Priv. Information to Hoglund Law offices.	0.40	JO	\$120.00	\$48.00
06/03/2022	Service	A108 Communicate (other external) L110 Fact Investigation/Development: Call Hoglund Law Offices to notify them prior to sending signed authorization to release priv. information of client.	0.20	JO	\$120.00	\$24.00
06/03/2022	Service	A106 Communicate (with client) L330 Depositions: 6/1 Follow Up Call from Walker	0.10	AB	\$120.00	\$12.00

06/03/2022	Service	A108 Communicate (other external) L110 Fact Investigation/Development: Draft Cover Letter to Hogle Law Offices enclosing signed authorization to release privileged information.	0.20	JO	\$120.00	\$24.00
06/03/2022	Service	A103 Draft/revise C100 Fact Gathering: Read FRCP, drafted/revise Plaintiff's response to Defendant's first set of interrogatories and requests to produce.	3.00	AB	\$250.00	\$750.00
06/03/2022	Service	A102 Research C200 Researching Law: Prepare for deposition of Officer Gonzalez. Created a Deposition prep chart with theories of the case, theories of the defense case, and drafted questions for Attorney Huddleston to review.	3.00	AB	\$250.00	\$750.00
06/06/2022	Service	A103 Draft/revise L310 Written Discovery: Review and continue drafting responses to Defendant's written discovery requests.	2.30	OEO	\$300.00	\$690.00
06/07/2022	Service	A110 Manage data/files L330 Depositions: Compile relevant documents from Harris v. City of Milwaukee for research in depositions for Gonzalez and Mahay	0.80	AB	\$120.00	\$96.00
06/07/2022	Service	A105 Communicate (in firm) L110 Fact Investigation/Development: Internal communication with attorneys regarding discovery materials in preparation for upcoming deposition.	1.50	JO	\$120.00	\$180.00
06/07/2022	Service	A104 Review/analyze L110 Fact Investigation/Development: Review discovery materials for further attorney review in preparation of upcoming deposition.	4.00	JO	\$120.00	\$480.00
06/08/2022	Service	A110 Manage data/files L330 Depositions: Start creating binder of production materials for attorneys review for depositions	0.50	AB	\$120.00	\$60.00
06/08/2022	Service	A104 Review/analyze L330 Depositions: Review discovery and attorney review notes in preparation for Officer Gonzalez deposition	4.00	SHB	\$275.00	\$1,100.00
06/08/2022	Service	A108 Communicate (other external) L330 Depositions: Call with expert witness regarding Officer Gonzalez deposition	0.80	SHB	\$275.00	\$220.00
06/08/2022	Service	A108 Communicate (other external) L190 Other Case Assessment, Development and Administration: 6/8 Update on Medical Records Request	1.00	AB	\$120.00	\$120.00
06/08/2022	Service	A104 Review/analyze L110 Fact Investigation/Development: Review and analyze discovery material and create chart for attorney review.	5.00	JO	\$120.00	\$600.00
06/09/2022	Service	A104 Review/analyze L110 Fact Investigation/Development: Review and analyze discovery material for attorney review.	5.00	JO	\$120.00	\$600.00

06/10/2022	Service	A104 Review/analyze L310 Written Discovery: Review and internal discussion of draft discovery responses	1.20	MM	\$250.00	\$300.00
06/10/2022	Service	A104 Review/analyze L110 Fact Investigation/ Development: Review discovery material for attorney review.	5.00	JO	\$120.00	\$600.00
06/14/2022	Service	A108 Communicate (other external) L190 Other Case Assessment, Development and Administration: 6/14 Call to ED re Pro Bono Status	0.10	AB	\$120.00	\$12.00
06/14/2022	Service	A105 Communicate (in firm) L130 Experts/Consultants: Call with Expert Brian Landers with Atty Brown and Atty Huddleston	0.50	JO	\$120.00	\$60.00
06/14/2022	Service	A104 Review/analyze L110 Fact Investigation/ Development: Review and analyze discovery materials for further attorney review.	1.50	JO	\$120.00	\$180.00
06/14/2022	Service	A108 Communicate (other external) L130 Experts/ Consultants: Spoke to Expert in regards to 1983 claims and opinion regarding legal issues. Attorney Huddleston and Joey O'Neill present.	0.50	AB	\$250.00	\$125.00
06/15/2022	Service	A108 Communicate (other external) L140 Document/ File Management: Call Hoglund Law Offices to follow-up on status of autho and letter previously sent on 6/3/22	0.20	JO	\$120.00	\$24.00
06/15/2022	Service	A107 Communicate (other outside counsel) C100 Fact Gathering: Spoke with Assistant City Attorney Anthony Jackson RE: Walker discovery updates and depositions.	0.20	AB	\$250.00	\$50.00
06/21/2022	Service	Client Meeting: Meeting with client regarding deposition prep	1.00	JO	\$120.00	\$120.00
06/21/2022	Service	A106 Communicate (with client) C300 Analysis and Advice: Met with Mr. Walker with Attorney Huddleston and Paralegal Joey O'Neill present. Prepped Mr. Walker for the upcoming deposition.	1.30	AB	\$250.00	\$325.00
06/22/2022	Service	A106 Communicate (with client) C300 Analysis and Advice: Spoke to Mr. Walker to let him know the deposition has been rescheduled for a later date. He said he understood.	0.10	AB	\$250.00	\$25.00
06/22/2022	Service	A104 Review/analyze L110 Fact Investigation/ Development: Review and analyze Client's medical records from Froedtert and Renew Counseling Services. Summarize for further attorney review.	2.00	JO	\$120.00	\$240.00
06/22/2022	Service	A108 Communicate (other external) C300 Analysis and Advice: Spoke with Dr. Mary Beth Sadie with Attorney Huddleston present to decipher medical notes and ask for opinion/advice regarding Walker's damages.	0.30	AB	\$250.00	\$75.00
06/23/2022	Service	A104 Review/analyze L110 Fact Investigation/	2.00	JO	\$120.00	\$240.00

		Development: Review and analyze Client's medical records from Froedtert Hospital and summarize for further atty review.				
06/23/2022	Service	A102 Research L120 Analysis/Strategy: Research relevant case law pertaining to qualified immunity	0.60	JO	\$120.00	\$72.00
06/24/2022	Service	A108 Communicate (other external) L140 Document/File Management: Call/ Fax to Hoglund Law Offices to obtain status of signed autho.	0.20	JO	\$120.00	\$24.00
06/24/2022	Service	A103 Draft/revise L310 Written Discovery: Draft response shell for defendant's first set of request for admissions.	0.60	JO	\$120.00	\$72.00
06/24/2022	Service	A103 Draft/revise L430 Written Motions and Submissions: Draft Motion and joint stipulation to amend complaint.	0.50	JO	\$120.00	\$60.00
06/24/2022	Service	A103 Draft/revise L430 Written Motions and Submissions: Draft stipulation and joint motion to amend scheduling order.	0.50	JO	\$120.00	\$60.00
06/28/2022	Service	A108 Communicate (other external) L110 Fact Investigation/Development: Call to Hoglund Law to follow-up on authorization to release Client file.	0.20	JO	\$120.00	\$24.00
06/29/2022	Service	A102 Research L110 Fact Investigation/Development: Research qualified immunity case law for ABB	2.00	JO	\$120.00	\$240.00
06/29/2022	Service	A110 Manage data/files L310 Written Discovery: Compile all Bates Stamped production from City and put into binders for review	4.00	AB	\$120.00	\$480.00
06/30/2022	Service	A110 Manage data/files L310 Written Discovery: Finalize discovery binders	3.00	AB	\$120.00	\$360.00
07/05/2022	Service	A104 Review/analyze L140 Document/File Management: Review Client's file from Hoglund Law	0.30	JO	\$120.00	\$36.00
07/05/2022	Service	A103 Draft/revise C100 Fact Gathering: Revised Requests for Admissions. Spoke to Mr. Walker three separate times in regards to the answers to the requests for admissions. Consulted with Attorney Huddleston and Paralegal Joey O'Neill to decide best approach to responses.	2.00	AB	\$250.00	\$500.00
07/07/2022	Service	A103 Draft/revise L140 Document/File Management: Draft Amended Complaint shell for ABB/SCH	0.70	JO	\$120.00	\$84.00
07/07/2022	Service	A102 Research L110 Fact Investigation/Development: Research relevant case law for ABB/SCH	1.50	JO	\$120.00	\$180.00
07/07/2022	Service	A105 Communicate (in firm) L120 Analysis/Strategy: Meet with ABB regarding Amended Complaint and review relevant case law.	0.50	JO	\$120.00	\$60.00

07/07/2022	Service	A105 Communicate (in firm) C200 Researching Law: Meeting with Paralegal Joey O'Neill in regards to amended complaint. Researched relevant 1983 cases, listened to internal affairs questioning, met with Attorney Huddleston for advice on adding additional parties to the complaint.	0.50	AB	\$250.00	\$125.00
07/08/2022	Service	A102 Research C200 Researching Law: Researched 1983 claims and outline for amended complaint with Paralegal Joey O'Neill.	1.70	AB	\$250.00	\$425.00
07/11/2022	Service	A104 Review/analyze C200 Researching Law: Bate Stamped documents to be produced in production, revised Plaintiff's First Set of Interrogatories and RFP, drafted detailed email to Attorney Huddleston containing all documents that need to be reviewed, reviewed Mr. Walker's disability file.	3.50	AB	\$250.00	\$875.00
07/11/2022	Service	A103 Draft/revise L210 Pleadings: Draft/revise Amended Complaint for SCH/ABB	0.50	JO	\$120.00	\$60.00
07/11/2022	Service	A104 Review/analyze C200 Researching Law: Revised Interrogatories, Bate Stamped production, compiled folder of documents to be submitted with interrogatories. Sent emails to Attorney Jackson regarding filing.	5.00	AB	\$250.00	\$1,250.00
07/12/2022	Service	A104 Review/analyze L140 Document/File Management: Review and analyze rogs/ defendant's requests for production and add witness information for SCH/ABB	0.50	JO	\$120.00	\$60.00
07/12/2022	Service	A104 Review/analyze L140 Document/File Management: Review and analyze our bates production and draft a list of bates for ABB/SCH	0.50	JO	\$120.00	\$60.00
07/12/2022	Service	A103 Draft/revise L140 Document/File Management: Bates Stamp 300+ of Client's medical records for production	0.40	JO	\$120.00	\$48.00
07/15/2022	Service	A106 Communicate (with client) C300 Analysis and Advice: Met with Client to review interrogatories, requests for production, medical release forms, and next steps.	0.30	AB	\$250.00	\$75.00
07/18/2022	Service	A104 Review/analyze L110 Fact Investigation/ Development: Review and analyze over 400 pages of Client's medical records from Dodge Correctional and add into medical chronology/summary for further review by SCH/ABB	4.00	JO	\$120.00	\$480.00
07/19/2022	Service	A104 Review/analyze L110 Fact Investigation/ Development: Review and analyze 250 pages of Client's medical records from Dodge Correctional Institution and summarize relevant information for further review by Attorney SCH/ABB	2.50	JO	\$120.00	\$300.00
08/01/2022	Service	A107 Communicate (other outside counsel) C400 Third Party Communication: Followed up with Attorney	0.10	AB	\$250.00	\$25.00

Jackson RE: Plaintiff's First Request for Discovery						
08/03/2022	Service	Research: Research Heck Standard for surviving summary judgement for further review by ABB/SCH	2.00	JO	\$120.00	\$240.00
08/03/2022	Service	A103 Draft/revise L120 Analysis/Strategy: Draft and revise analysis and strategy memorandum regarding claims and damages for further review by SCH	3.00	AB	\$250.00	\$750.00
08/04/2022	Service	A105 Communicate (in firm) L120 Analysis/Strategy: Meeting with SCH and ABB regarding case strategy	0.50	JO	\$120.00	\$60.00
08/04/2022	Service	A105 Communicate (in firm) L120 Analysis/Strategy: Meeting with SCH and JEO regarding case strategy	0.50	AB	\$250.00	\$125.00
08/09/2022	Service	A103 Draft/revise C300 Analysis and Advice: Drafted letter to client RE: heck standard, state claims, and amending john doe police officers.	0.50	AB	\$250.00	\$125.00
08/10/2022	Service	A105 Communicate (in firm) C200 Researching Law: Meeting with Sam to discuss next steps RE: qualified immunity.	0.50	AB	\$250.00	\$125.00
08/12/2022	Service	A104 Review/analyze L310 Written Discovery: Review and analyze Def's Supplemental Responses to Pl's First Set of Requests for Production of Documents.	0.50	JO	\$120.00	\$60.00
08/17/2022	Service	A102 Research L120 Analysis/Strategy: Research and brief relevant case law for further review by ABB/SCH	1.50	JO	\$120.00	\$180.00
08/17/2022	Service	A102 Research L390 Other Discovery: Review and analyze research memo regarding several pertinent issues related to merits of case (e.g. naming additional john does, potential addition of state law claims, qualified immunity, etc); Review status correspondence to client	1.50	OEO	\$300.00	\$450.00
08/22/2022	Service	A102 Research P280 Other: Pull complaint from PACER for Eastern District of WI Case No 13-CV--511.	0.20	JO	\$120.00	\$24.00
08/23/2022	Service	A102 Research L120 Analysis/Strategy: Research relevant case law (Brown v. Walworth County), pull/read complaint and other relevant pleadings and summarize factual alignment for ABB	1.00	JO	\$120.00	\$120.00
08/25/2022	Service	A102 Research L120 Analysis/Strategy: Research relevant case law (Brown v. Walworth County), pull/read complaint and other relevant pleadings and summarize factual alignment for ABB	2.00	JO	\$120.00	\$240.00
08/26/2022	Service	A105 Communicate (in firm) L210 Pleadings: Meet with ABB regarding amended complaint	1.60	JO	\$120.00	\$192.00
08/26/2022	Service	A103 Draft/revise L390 Other Discovery: Draft letter to City Attorney regarding discovery deficiencies for ABB	0.20	JO	\$120.00	\$24.00
08/26/2022	Service	Review/Edit second amended complaint; Review	1.20	OEO	\$300.00	\$360.00

		discovery deficiency notice letter				
08/29/2022	Service	A104 Review/analyze L210 Pleadings: Review/revise second amended complaint for grammatical and formatting edits for ABB	1.00	JO	\$120.00	\$120.00
09/07/2022	Service	A103 Draft/revise L210 Pleadings: Draft Consent Agreement to transfer Walker as Pro Bono client to Private/Contingency Client	0.40	AB	\$120.00	\$48.00
09/07/2022	Service	A104 Review/analyze L390 Other Discovery: Review and analyze MPD SOP's	1.00	JO	\$120.00	\$120.00
09/08/2022	Service	A108 Communicate (other external) L210 Pleadings: Email Judge Joseph word doc of proposed order to amend complaint	0.10	JO	\$120.00	\$12.00
09/09/2022	Service	A104 Review/analyze L390 Other Discovery: Review/analyze SOP's produced from supplemental discovery, notate relevant findings for further review by SHB/ABB	0.50	JO	\$120.00	\$60.00
09/09/2022	Service	A103 Draft/revise L390 Other Discovery: Draft notices of depositions for police officers, draft engagement letter for contingency, and modify consent agreement	2.00	AB	\$120.00	\$240.00
09/09/2022	Service	Review notice of depositions for officers	0.50	OEO	\$300.00	\$150.00
09/09/2022	Service	A103 Draft/revise C300 Analysis and Advice: Revised final letter to send to Client, Drafted email to Client, had email and corresponding documents sent out via U.S mail	0.50	AB	\$250.00	\$125.00
09/11/2022	Service	A103 Draft/revise C400 Third Party Communication: Prepared 30(b)(6) motion for review.	0.30	AB	\$250.00	\$75.00
09/12/2022	Service	A104 Review/analyze L390 Other Discovery: Review and analyze SOP's produced by the City of Milwaukee and summaries for further review by SHB/ABB	1.00	JO	\$120.00	\$120.00
09/12/2022	Service	A106 Communicate (with client) P280 Other: Communicate with Client and schedule meeting with SHB and ABB	0.10	JO	\$120.00	\$12.00
09/12/2022	Service	A103 Draft/revise C100 Fact Gathering: Revised 30(b)(6) motion. Read Am Jur to draft 30(b)(6) motion.	1.00	AB	\$250.00	\$250.00
09/12/2022	Service	A103 Draft/revise L330 Depositions: Finalize deposition notices and send over to OC	0.80	AB	\$120.00	\$96.00
09/12/2022	Service	A103 Draft/revise L390 Other Discovery: Review updated productions and discovery from the city of Milwaukee to begin the selection of key documents and information for upcoming depositions and case planning	4.50	OEO	\$300.00	\$1,350.00
09/15/2022	Service	Client Meeting: Met with Client to discuss Client Letter with SHB present.	1.00	AB	\$250.00	\$250.00

09/19/2022	Service	A103 Draft/revise L330 Depositions: Revise deposition notices to reflect available dates for defendants, finalize and send to OC. Compile dates into attorneys' and Clio calendar.	1.00	AB	\$120.00	\$120.00
09/20/2022	Service	A108 Communicate (other external) L140 Document/ File Management: Follow-up with House of Corrections regarding outstanding medical records	0.10	JO	\$120.00	\$12.00
09/22/2022	Service	A108 Communicate (other external) L330 Depositions: Schedule depositions for Mahay, Clifford, Purcelli, and Schmitz	0.40	AB	\$120.00	\$48.00
09/30/2022	Service	Compile: Compiled Walker Deposition Book and developed sample questions for SHB.	8.00	AB	\$250.00	\$2,000.00
10/06/2022	Service	Review: Prepare for Mahay deposition by reviewing records and discovery	9.50	OEO	\$300.00	\$2,850.00
10/07/2022	Service	A103 Draft/revise L330 Depositions: Draft status update letter to the Client for further review by Attorney SHB.	0.30	JO	\$120.00	\$36.00
10/11/2022	Service	Compile: Create Deposition Binder according to Deposition Excel Spreadsheet (created by Allysa Brown) for further review by Attorney OEO/SHB	0.80	JO	\$120.00	\$96.00
10/11/2022	Service	Compile: Create binder with SOP's produced by the City for further review by Attorney OEO/SHB	0.50	JO	\$120.00	\$60.00
10/12/2022	Service	A110 Manage data/files L140 Document/File Management: Organize Discovery file, create Discovery process chart for further review of Attorney SHB and OEO	0.80	JO	\$120.00	\$96.00
10/13/2022	Service	A110 Manage data/files L330 Depositions: Compile necessary documents and exhibits for Balbir Mahay deposition and provide to OEO	0.30	AB	\$120.00	\$36.00
10/13/2022	Service	A101 Plan and prepare for L330 Depositions: Identify and compile documents for further review by Attorney SHB and OEO in preparation for the deposition of Balbir Mahay.	0.50	JO	\$120.00	\$60.00
10/13/2022	Service	A105 Communicate (in firm) P280 Other: Internal communication regarding deposition of Balbir Mahay	0.20	JO	\$120.00	\$24.00
10/13/2022	Service	A108 Communicate (other external) L210 Pleadings: Draft letter to court regarding transfer to contingency and call Eastern District to see how they would prefer us to file	0.50	AB	\$120.00	\$60.00
10/13/2022	Service	A103 Draft/revise L210 Pleadings: Draft Notice of Appearance for Transfer from Pro Bono to Private Client, sent to OEO and SHB for approval and file with the court.	0.50	AB	\$120.00	\$60.00
10/13/2022	Service	Manage Data/Files: Create Bates stamp log	0.80	JO	\$120.00	\$96.00

10/13/2022	Service	Appear/Attend: Continue prep for deposition; Attend deposition of PO Mahay	3.00	OEO	\$300.00	\$900.00
10/14/2022	Service	A107 Communicate (other outside counsel) L330 Depositions: Email to OC regarding Deposition dates for Gonzales, Clifford and Boll	0.20	AB	\$120.00	\$24.00
10/14/2022	Service	A108 Communicate (other external) L330 Depositions: Correspond with court reporter to schedule Tanya Boll's deposition	0.20	AB	\$120.00	\$24.00
10/14/2022	Service	Appear/Attend: Draft summary of deposition of PO Mahay based on deposition notes	2.20	OEO	\$300.00	\$660.00
10/17/2022	Service	A104 Review/analyze L330 Depositions: Review deposition documents to help with the preparation for the upcoming deposition of Daniel Clifford.	0.20	JO	\$120.00	\$24.00
10/18/2022	Service	A104 Review/analyze L350 Discovery Motions: Review Cit's Motion and Brief ISO Motion to bifurcate discovery	0.50	OEO	\$300.00	\$150.00
10/18/2022	Service	A102 Research L210 Pleadings: Research local court rules for timeline of brief responses	0.20	AB	\$120.00	\$24.00
10/18/2022	Service	A101 Plan and prepare for L330 Depositions: Prepare for PO Clifford deposition by reviewing records and discovery	9.50	OEO	\$300.00	\$2,850.00
10/19/2022	Service	A103 Draft/revise L390 Other Discovery: Draft email to City Attorney Jackson requesting supplemental discovery documents specifically for P.O. Gonzalez	0.20	JO	\$120.00	\$24.00
10/19/2022	Service	A102 Research L210 Pleadings: Conduct research on Horton v. City of Chicago and draft research analysis on relevancy to Client's case in preparation to respond to the Defendant's motion to bifurcate for further review by Attorney SHB and Attorney OEO.	1.00	JO	\$120.00	\$120.00
10/19/2022	Service	A101 Plan and prepare for L330 Depositions: Print and compile exhibits in preparation for the deposition of Daniel Clifford for further review by Attorney OEO.	0.40	JO	\$120.00	\$48.00
10/20/2022	Service	A109 Appear for/attend L330 Depositions: Attend deposition of PO Clifford	3.50	OEO	\$300.00	\$1,050.00
10/21/2022	Service	A103 Draft/revise L120 Analysis/Strategy: Draft and revise research memo of Horton v. City of Chicago specifically pertaining to relevant factors of similarity to motion to bifurcate. Send to Attorney SHB and Attorney OEO for further attorney review.	0.50	JO	\$120.00	\$60.00
10/21/2022	Service	A109 Appear for/attend L330 Depositions: Draft summary of deposition of PO Clifford	1.20	OEO	\$300.00	\$360.00
10/23/2022	Service	Email/Phone Call; Research SOL issue; Draft correspondence to OC re same	1.80	OEO	\$300.00	\$540.00

10/24/2022	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Draft shell of our response brief in opposition of defendant's motion to bifurcate for further review by Attorney SHB and Attorney OEO.	0.30	JO	\$120.00	\$36.00
10/24/2022	Service	A102 Research L140 Document/File Management: Research Eastern District of Wisconsin local rules pertaining to response deadlines to motions	0.10	JO	\$120.00	\$12.00
10/25/2022	Service	A108 Communicate (other external) L140 Document/File Management: Correspondence with Froedtert Hospital regarding missing billing and invoice documents.	0.20	JO	\$120.00	\$24.00
10/28/2022	Service	Compile: Compile Client's medical records from the date of the incident forward for further review by expert Jaquelyn Maki.	0.40	JO	\$120.00	\$48.00
10/28/2022	Service	A108 Communicate (other external) L420 Expert Witnesses: Review case calendar and correspond with expert witnesses on reports and case status	0.40	SHB	\$275.00	\$110.00
10/28/2022	Service	A104 Review/analyze L330 Depositions: Review and analyze deposition transcript of Balbir Mahay. Summarize relevant deposition testimony for further review by Attorney OEO and Attorney SHB.	2.00	JO	\$120.00	\$240.00
10/28/2022	Service	A106 Communicate (with client) L330 Depositions: Phone and email communication with Client regarding depositions administered last week and next week.	0.20	JO	\$120.00	\$24.00
10/30/2022	Service	A104 Review/analyze L330 Depositions: Review and analyze Mahay depo transcript	2.40	OEO	\$300.00	\$720.00
11/01/2022	Service	Compile: Compile Froedtert billing records to Dropbox link for expert.	0.10	JO	\$120.00	\$12.00
11/01/2022	Service	A104 Review/analyze L330 Depositions: Review and analyze the deposition transcript of Daniel Clifford. Summarize relevant deposition testimony for further review by Attorney SHB and Attorney OEO.	2.00	JO	\$120.00	\$240.00
11/01/2022	Service	A106 Communicate (with client) L330 Depositions: Communication with Client regarding depositions, schedule meeting with Client, OEO and SHB.	0.10	JO	\$120.00	\$12.00
11/02/2022	Service	A104 Review/analyze L330 Depositions: Review and analyze the deposition transcript of Daniel Clifford. Summarize relevant deposition testimony for further review by Attorney SHB and Attorney OEO.	0.50	JO	\$120.00	\$60.00
11/02/2022	Service	Compile: Compile deposition documents for Balbir Mahay and Daniel Clifford into Dropbox link for Expert Brian Landers review.	0.30	JO	\$120.00	\$36.00
11/03/2022	Service	A104 Review/analyze TR110 Fact Investigation and Development: Review and analyze relevant billing records	0.50	JO	\$120.00	\$60.00

		from Froedtert Hospital pertaining to the Client's injuries. Summarize and tabulate billing records for further review by Attorney OEO and SHB.				
11/03/2022	Service	A104 Review/analyze TR110 Fact Investigation and Development: Prepare for deposition of Former PO Prucelli by reviewing prior testimonies, pertinent documents in discovery, and drafting areas of further inquiry	6.50	OEO	\$300.00	\$1,950.00
11/04/2022	Service	A109 Appear for/attend L330 Depositions: Attend deposition of Officer Prucelli	2.50	OEO	\$300.00	\$750.00
11/07/2022	Service	Compile: Compile exhibits utilized at the deposition of Lisa Purcelli and send them to the court reporter.	0.20	JO	\$120.00	\$24.00
11/07/2022	Service	Compile: Compile relevant documents including statements from Client, Client's mother, Client's son, and Client step father pertaining to the incident for further review by Attorney OEO and Attorney SHB.	0.50	JO	\$120.00	\$60.00
11/08/2022	Service	A102 Research L350 Discovery Motions: Research case law re motion to bifurcate	2.50	SHB	\$275.00	\$687.50
11/08/2022	Service	A103 Draft/revise L350 Discovery Motions: Draft response brief IOO Defs motion to bifurcate; finalize and file.	4.50	SHB	\$275.00	\$1,237.50
11/08/2022	Service	A101 Plan and prepare for L330 Depositions: Plan and prepare for deposition of officer gonzalez by review and analyzing discovery documents and prior deposition transcripts of other officer and their reports	6.00	OEO	\$300.00	\$1,800.00
11/09/2022	Service	Appear/Attend: Attend deposition of Jeremy Gonzalez administered on 11/9/2022.	3.00	JO	\$120.00	\$360.00
11/09/2022	Service	A109 Appear for/attend L330 Depositions: Attend and take deposition of Officer Gonzalez	3.00	OEO	\$300.00	\$900.00
11/09/2022	Service	Draft: Draft status letter to client re. depositions for further review by Attorney OEO.	0.10	JO	\$120.00	\$12.00
11/14/2022	Service	A108 Communicate (other external) L130 Experts/Consultants: Communication to Expert Brian Landers re. Jeremy Gonzalez's deposition documents.	0.10	JO	\$120.00	\$12.00
11/16/2022	Service	A108 Communicate (other external) L130 Experts/Consultants: Phone conference with Dr. Beth Brant with Attorney OEO and SHB.	0.50	JO	\$120.00	\$60.00
11/16/2022	Service	A108 Communicate (other external) L120 Analysis/Strategy: Communication with Dr. Sadie re. potential expert report and following up on Attorney SHB email.	0.20	JO	\$120.00	\$24.00
11/16/2022	Service	A108 Communicate (other external) L130 Experts/Consultants: Communication with Expert Brian Landers	0.10	JO	\$120.00	\$12.00

re. Lisa Purcelli deposition documents						
11/16/2022	Service	A108 Communicate (other external) L130 Experts/Consultants: Communicate regarding potential retainment of expert witness	0.20	JO	\$120.00	\$24.00
11/17/2022	Service	A103 Draft/revise L330 Depositions: Draft correspondence to Attorney Jackson re. post-deposition demands of Jeremy Gonzalez for further review by Attorney OEO and Attorney SHB.	0.30	JO	\$120.00	\$36.00
11/17/2022	Service	A104 Review/analyze L310 Written Discovery: Review correspondence to OC requesting deposition documents	0.20	OEO	\$300.00	\$60.00
11/17/2022	Service	A107 Communicate (other outside counsel) L330 Depositions: Correspondence with Attorney Jackson re. post-deposition demands of Jeremy Gonzalez.	0.10	JO	\$120.00	\$12.00
11/18/2022	Service	A106 Communicate (with client) L330 Depositions: Communicate with Client re. potential deposition dates	0.10	JO	\$120.00	\$12.00
11/18/2022	Service	A108 Communicate (other external) L250 Other Written Motions and Submissions: Communicate with the Judge's clerk re. discovery bifurcation motion	0.20	JO	\$120.00	\$24.00
11/21/2022	Service	A108 Communicate (other external) L130 Experts/Consultants: Confer with Dr. Black re. psychiatric medical record review of client.	0.40	JO	\$120.00	\$48.00
11/21/2022	Service	A107 Communicate (other outside counsel) L330 Depositions: Communicate with OC re. scheduling of deposition of our client	0.10	JO	\$120.00	\$12.00
11/21/2022	Service	Draft: Draft updated medical records request to Renew Counseling requesting expansive medical records from client's adolescence.	0.30	JO	\$120.00	\$36.00
11/22/2022	Service	A107 Communicate (other outside counsel) P280 Other: Followed up with Renew Counseling regarding medical record request and autho we sent on 11/21.	0.10	JO	\$120.00	\$12.00
11/28/2022	Service	A108 Communicate (other external) L130 Experts/Consultants: Communication with Dr. James Black re. meeting with SHB and OEO to go over the preliminary report	0.10	JO	\$120.00	\$12.00
11/28/2022	Service	A108 Communicate (other external) L130 Experts/Consultants: Teams meeting with Dr. Brant	0.50	SHB	\$275.00	\$137.50
11/29/2022	Service	A108 Communicate (other external) L140 Document/File Management: Called Renew Counseling services to check status of medical records request sent on 11/21/22.	0.10	JO	\$120.00	\$12.00
11/30/2022	Service	A104 Review/analyze L330 Depositions: Review and analyze the deposition transcript of Jeremy Gonzalez. Draft deposition summary for further review by Attorney	2.00	JO	\$120.00	\$240.00

OEO and Attorney SHB.						
12/01/2022	Service	Review decision from court denying Defendant's mtn to bifurcate	0.50	OEO	\$300.00	\$150.00
12/02/2022	Service	A104 Review/analyze L330 Depositions: Review and analyze the deposition transcript of Lisa Purcelli. Summarize relevant deposition testimony for further review by Attorney OEO and Attorney SHB.	2.50	JO	\$120.00	\$300.00
12/02/2022	Service	Compile all statements given by officers for further review by OEO and SHB.	0.50	JO	\$120.00	\$60.00
12/02/2022	Service	A104 Review/analyze L130 Experts/Consultants: Review preliminary draft report submitted by Brian Landers.	0.50	JO	\$120.00	\$60.00
12/06/2022	Service	Review: Draft list of anticipated deposition topics of Mr. Walker for further review by Attorney OEO and Attorney SHB.	0.50	JO	\$120.00	\$60.00
12/08/2022	Service	A108 Communicate (other external) L140 Document/File Management: Call to Renew Counseling Services to follow-up on medical records request sent on 11/21/22.	0.20	JO	\$120.00	\$24.00
12/08/2022	Service	A103 Draft/revise L140 Document/File Management: Draft and finalize medical records request to the Dewey Center.	0.20	JO	\$120.00	\$24.00
12/20/2022	Service	A104 Review/analyze L310 Written Discovery: Review supplemental discovery materials provided by city of milwaukee	2.40	OEO	\$300.00	\$720.00
12/22/2022	Service	A108 Communicate (other external) L130 Experts/Consultants: Phone conference with potential expert (psych) Dr. James Black to discuss fee schedule and next steps.	0.40	JO	\$120.00	\$48.00
12/28/2022	Service	A104 Review/analyze L330 Depositions: Review and analyze 30 pages of Client's deposition transcript. Begin drafting deposition summary for further review by Attorneys OEO and SHB.	0.60	JO	\$120.00	\$72.00
12/28/2022	Service	A101 Plan and prepare for L330 Depositions: Review anticipated deposition documents of Sgt. Boll, including key documents such as initial statement and disciplinary record in preparation of upcoming deposition on 1/5/23.	0.40	JO	\$120.00	\$48.00
12/29/2022	Service	A104 Review/analyze L330 Depositions: Review deposition transcript of Client. Draft and complete deposition summary of Client for further review by Attorney OEO and Attorney SHB.	2.00	JO	\$120.00	\$240.00
01/04/2023	Service	A101 Plan and prepare for L330 Depositions: Prepare for deposition of tanya boll's by reviewing matter notes and materials	4.50	OEO	\$350.00	\$1,575.00

01/05/2023	Service	A101 Plan and prepare for L330 Depositions: Continue preparing for deposition of Tanya Boll's by reviewing matter notes and materials	5.10	OEO	\$350.00	\$1,785.00
01/05/2023	Service	A101 Plan and prepare for L330 Depositions: Prepare for the deposition of Tanya Boll, including searching for relevant exhibits, reviewing materials, and preparing documents.	0.70	JO	\$120.00	\$84.00
01/05/2023	Service	A109 Appear for/attend L330 Depositions: Attend deposition of Tanya Boll	4.00	OEO	\$350.00	\$1,400.00
01/09/2023	Service	A104 Review/analyze L390 Other Discovery: Reviewed discovery (police report).	1.00	CJD	\$0.00	\$0.00
01/10/2023	Service	A110 Manage data/files TR120 Analysis/Strategy: Create deposition transcript binders including each deponent's transcripts for further analytical review by OEO and SHB.	0.50	JO	\$120.00	\$60.00
01/10/2023	Service	A104 Review/analyze L390 Other Discovery: Review of discovery files.	1.70	CJD	\$120.00	\$204.00
01/10/2023	Service	A104 Review/analyze L390 Other Discovery: Reviewed discovery and pleadings.	1.00	CJD	\$120.00	\$120.00
01/11/2023	Service	A108 Communicate (other external) L330 Depositions: Communicate with Expert Brian Landers regarding deposition transcripts for his review.	0.10	JO	\$120.00	\$12.00
01/11/2023	Service	A108 Communicate (other external) L330 Depositions: Communication with Cream City Court Reporting re. incorrect date listed on the cover sheet of Boll's deposition transcript.	0.10	JO	\$120.00	\$12.00
01/11/2023	Service	A104 Review/analyze L390 Other Discovery: Reviewed deposition transcripts and expert reports.	4.50	CJD	\$120.00	\$540.00
01/11/2023	Service	A104 Review/analyze L390 Other Discovery: Reviewed expert report and client's deposition.	0.60	CJD	\$120.00	\$72.00
01/11/2023	Service	A104 Review/analyze L390 Other Discovery: Continued review of deposition transcripts.	1.90	CJD	\$120.00	\$228.00
01/12/2023	Service	A104 Review/analyze L390 Other Discovery: Reviewed deposition transcripts.	1.50	CJD	\$120.00	\$180.00
01/18/2023	Service	A104 Review/analyze L390 Other Discovery: Continued review of Walker discovery and expert reports.	2.00	CJD	\$120.00	\$240.00
01/23/2023	Service	A104 Review/analyze L240 Dispositive Motions: Review and analyze Defendant's Motion for Summary Judgment, brief in support, and statements of facts	2.50	OEO	\$350.00	\$875.00
01/23/2023	Service	A102 Research L240 Dispositive Motions: Research recent cases on qualified immunity involving officer-involved shooting	3.80	OEO	\$350.00	\$1,330.00

01/23/2023	Service	A104 Review/analyze L240 Dispositive Motions: Review deposition transcripts in preparation for drafting objections to City's statement of facts for SMJ	3.20	OEO	\$350.00	\$1,120.00
01/24/2023	Service	A103 Draft/revise P280 Other: Draft status update to client regarding MSJ for further review by Atty SHB & OEO	0.40	JO	\$120.00	\$48.00
01/24/2023	Service	A104 Review/analyze L210 Pleadings: review defendant's proposed statement of fact filed in conjunction of MSJ.	0.40	JO	\$120.00	\$48.00
01/24/2023	Service	A108 Communicate (other external) L130 Experts/Consultants: Communicate with Expert Brian Landers regarding appointment with Atty OEO and SHB.	0.10	JO	\$120.00	\$12.00
01/30/2023	Service	A102 Research L190 Other Case Assessment, Development and Administration: Discussed briefing strategy and next steps, began outlining for brief IOO city's SJ motion.	0.50	CJD	\$120.00	\$60.00
01/31/2023	Service	A103 Draft/revise L210 Pleadings: Draft responses to Defendant's proposed findings of fact and locate evidence to refute disputed facts for further review by Atty SHB and OEO.	2.50	JO	\$120.00	\$300.00
02/01/2023	Service	A103 Draft/revise L240 Dispositive Motions: Reviewed evidence to support our denial of D's PFOF.	2.00	CJD	\$120.00	\$240.00
02/06/2023	Service	A102 Research L120 Analysis/Strategy: Researching and outlining for motion IOO City's MSJ. Developed legal theories based on research.	4.30	OEO	\$350.00	\$1,505.00
02/06/2023	Service	A102 Research L120 Analysis/Strategy: Continue research and analysis into our motion IOO D's MSJ. Crafting legal theories.	2.00	CJD	\$120.00	\$240.00
02/08/2023	Service	A105 Communicate (in firm) L120 Analysis/Strategy: Internal conference with CD and Atty SB re. MSJ responses, including responses to proposed statements of facts.	0.80	JO	\$120.00	\$96.00
02/08/2023	Service	A102 Research L120 Analysis/Strategy: Continued research for brief IOO D's MSJ, including meeting with Sam regarding the proposed finding of facts.	4.00	CJD	\$120.00	\$480.00
02/10/2023	Service	Draft: Draft chart of material facts pursuant to our responses to defendant's motion for summary judgement.	2.00	JO	\$120.00	\$240.00
02/13/2023	Service	A103 Draft/revise L240 Dispositive Motions: Drafting brief IOO D's MSJ. Includes review of similar briefs and spot research.	4.00	CJD	\$120.00	\$480.00
02/13/2023	Service	Compile: Compile audio recordings and correspond with Cream City Reporting re. audio transcriptions	0.20	JO	\$120.00	\$24.00
02/13/2023	Service	Draft and Revise responses to statements of facts in	4.50	OEO	\$350.00	\$1,575.00

		preparation for drafting response to City's Motion for summary judgment				
02/13/2023	Service	A103 Draft/revise L240 Dispositive Motions: Draft brief IOO D's MSJ, organizing structure of brief.	3.00	CJD	\$120.00	\$360.00
02/15/2023	Service	A103 Draft/revise L240 Dispositive Motions: Finished brief outline for brief IOO D's MSJ. Finalized case research.	3.00	CJD	\$120.00	\$360.00
02/15/2023	Service	A105 Communicate (in firm) L240 Dispositive Motions: Reviewed draft brief with Sam.	0.70	CJD	\$120.00	\$84.00
02/15/2023	Service	A104 Review/analyze L120 Analysis/Strategy: Recording D's factual assertions to respond based on disputed evidence at SJ stage.	0.60	CJD	\$120.00	\$72.00
02/15/2023	Service	A104 Review/analyze L240 Dispositive Motions: Review and analyze plaintiff's motion for summary judgment and proposed findings of fact. Create material fact discrepancy chart for further review by Atty SHB.	0.80	JO	\$120.00	\$96.00
02/16/2023	Service	A104 Review/analyze L240 Dispositive Motions: Continue drafting material fact discrepancy chart for further review by Atty SHB	1.00	JO	\$120.00	\$120.00
02/20/2023	Service	A104 Review/analyze L110 Fact Investigation/Development: Review and analyze transcription of Officer Mahay's internal affairs interview and add into Motion for Summary Judgment chart for further review by Attorney SHB.	0.50	JO	\$120.00	\$60.00
02/20/2023	Service	A104 Review/analyze L110 Fact Investigation/Development: Review and analyze transcription of Officer Clifford's internal affairs interview and add into Motion for Summary Judgment chart for further review by Attorney SHB.	0.50	JO	\$120.00	\$60.00
02/20/2023	Service	A104 Review/analyze L110 Fact Investigation/Development: Review and analyze transcription of Officer Gonzalez's internal affairs interview and add into Motion for Summary Judgment chart for further review by Attorney SHB.	0.50	JO	\$120.00	\$60.00
02/20/2023	Service	A104 Review/analyze L110 Fact Investigation/Development: Review and analyze transcription of Officer Boll's internal affairs interview and add into Motion for Summary Judgment chart for further review by Attorney SHB.	0.60	JO	\$120.00	\$72.00
02/20/2023	Service	A103 Draft/revise L240 Dispositive Motions: Drafting brief IOO D's MSJ. Using Jocy's factual chart along with general research into our position.	3.50	CJD	\$120.00	\$420.00
02/20/2023	Service	A104 Review/analyze L240 Dispositive Motions: Continue drafting material fact discrepancy chart for	1.00	JO	\$120.00	\$120.00

		motion for summary judgment purposes.				
02/20/2023	Service	A103 Draft/revise L240 Dispositive Motions: Review CD draft of brief and initial research; conduct additional research on excessive force claim and qualified immunity; begin drafting brief	2.40	SHB	\$300.00	\$720.00
02/21/2023	Service	A108 Communicate (other external) L130 Experts/ Consultants: Compile documents and draft corresponding communication with expert Brian Landers.	0.20	JO	\$120.00	\$24.00
02/21/2023	Service	A103 Draft/revise L240 Dispositive Motions: Review and complete response to Def statement of facts; work on drafting brief IOO MSJ	5.40	SHB	\$300.00	\$1,620.00
02/22/2023	Service	A103 Draft/revise L210 Pleadings: Proof Plaintiff's responses to Defendants' Statement of Undisputed Facts	0.50	AB	\$120.00	\$60.00
02/22/2023	Service	A103 Draft/revise L240 Dispositive Motions: Assist with drafting responses to Defendants' proposed findings of fact relating to their MSJ.	2.00	JO	\$120.00	\$240.00
02/22/2023	Service	A103 Draft/revise L240 Dispositive Motions: Assist with drafting Plaintiff's Proposed Findings of Fact in opposition of MSJ.	1.00	JO	\$120.00	\$120.00
02/22/2023	Service	Compile: Compile and identify Plaintiff's Exhibits submitted in correspondence with Attorney Baker's declaration in opposition of MSJ.	1.50	JO	\$120.00	\$180.00
02/22/2023	Service	A103 Draft/revise L240 Dispositive Motions: Assist with drafting Attorney Baker's declaration in opposition of MSJ.	1.00	JO	\$120.00	\$120.00
02/22/2023	Service	A104 Review/analyze L240 Dispositive Motions: Review and identify witness statements as it relates to our responsive filings in opposition of MSJ.	0.50	JO	\$120.00	\$60.00
02/22/2023	Service	A103 Draft/revise L240 Dispositive Motions: Continue drafting MSJ brief and related submissions	6.70	SHB	\$300.00	\$2,010.00
02/22/2023	Service	A103 Draft/revise L240 Dispositive Motions: Continue drafting MSJ; finalize draft of MSJ for filing and file with court via efile	2.90	SHB	\$300.00	\$870.00
02/22/2023	Service	A103 Draft/revise L240 Dispositive Motions: Continue drafting MSJ brief and related submissions, including finalizing substantive argument sections	4.50	OEO	\$350.00	\$1,575.00
02/23/2023	Service	A106 Communicate (with client) L190 Other Case Assessment, Development and Administration: Draft communication to Client regarding our filings in opposition of Defendants' motion for summary judgment with brief update.	0.20	JO	\$120.00	\$24.00
02/23/2023	Service	A103 Draft/revise L210 Pleadings: Proof and help finalize Motion for Summary Judgment pleadings	0.50	AB	\$120.00	\$60.00

02/23/2023	Service	A110 Manage data/files L210 Pleadings: Assist with finalizing and filing motion for summary judgment response pleadings	1.00	AB	\$120.00	\$120.00
03/01/2023	Service	A103 Draft/revise L330 Depositions: Draft notice of deposition of City of Milwaukee Corporate Designee Brad Houston for further review by Atty SHB.	0.10	JO	\$120.00	\$12.00
03/01/2023	Service	A103 Draft/revise L330 Depositions: Draft notice of deposition of City of Milwaukee Corporate Designee Timothy Lietzke for further review by Atty SHB.	0.10	JO	\$120.00	\$12.00
03/01/2023	Service	A103 Draft/revise L330 Depositions: Draft notice of deposition of City of Milwaukee Corporate Designee Kevin Bolyard for further review by Atty SHB.	0.10	JO	\$120.00	\$12.00
03/02/2023	Service	Telephone conferece with Atty. Jackson re 30b6 depo	0.60	OEO	\$350.00	\$210.00
03/06/2023	Service	A103 Draft/revise L330 Depositions: Finalize/ send corporate designee depositions to OC.	0.10	JO	\$120.00	\$12.00
03/08/2023	Service	Review and analyze Defendant's reply brief submitted in support of its SMJ motion	0.50	OEO	\$350.00	\$175.00
03/08/2023	Service	Review responses of the City to Plaintiff's proposed statements of additional facts	0.80	OEO	\$350.00	\$280.00
03/09/2023	Service	A106 Communicate (with client) L140 Document/File Management: Draft status letter to the Client re. final filings to defendants' motion for summary judgment for further review by Atty OEO.	0.30	JO	\$120.00	\$36.00
03/09/2023	Service	A106 Communicate (with client) L140 Document/File Management: Compile exhibits we used with our filings in opposition of the defendants' motion for summary judgment and send upon client's request.	0.10	JO	\$120.00	\$12.00
03/09/2023	Service	A108 Communicate (other external) L330 Depositions: Communication via phone call to Cream City to cancel 30 (6) (b) depositions.	0.10	JO	\$120.00	\$12.00
03/10/2023	Service	A106 Communicate (with client) L140 Document/File Management: Draft communication to client regarding cancelation of corporate designee depositions.	0.20	JO	\$120.00	\$24.00
03/28/2023	Service	A103 Draft/revise L140 Document/File Management: Draft status letter to client re. result of defendants' motion for summary judgment for further review by Atty OEO/SHB.	0.50	JO	\$120.00	\$60.00
04/05/2023	Service	Attend scheduling conference	0.50	OEO	\$350.00	\$175.00
04/05/2023	Service	A103 Draft/revise L140 Document/File Management: draft status letter to client re. scheduling conference status update for further review by Atty OEO/SHB	0.20	JO	\$120.00	\$24.00

04/12/2023	Service	A103 Draft/revise L210 Pleadings: Draft SHB letter to court regarding rescheduling pretrial and trial date and send to OEO for review.	0.20	AB	\$120.00	\$24.00
04/17/2023	Service	A106 Communicate (with client) L140 Document/File Management: Draft status to client re. updated scheduling order (new trial dates) for further review by Atty SHB/OEO.	0.20	JO	\$120.00	\$24.00
04/17/2023	Service	A103 Draft/revise L130 Experts/Consultants: Draft expert witness disclosure	0.50	JO	\$120.00	\$60.00
04/17/2023	Service	A102 Research L420 Expert Witnesses: Research federal rules of procedure for expert witnesses.	0.20	JO	\$120.00	\$24.00
05/09/2023	Service	A110 Manage data/files P280 Other: Schedule dates for trial prep meetings	0.20	JO	\$120.00	\$24.00
05/12/2023	Service	A104 Review/analyze L410 Fact Witnesses: Review and analyze case file and create witness roster for anticipated witnesses for trial for further review by Atty SHB/OEO.	0.80	JO	\$120.00	\$96.00
05/22/2023	Service	A103 Draft/revise L210 Pleadings: Draft letter to the court requesting remote appearance at pretrial for OEO and send to OEO and SHB for review prior to filing.	0.30	AB	\$120.00	\$36.00
05/31/2023	Service	A103 Draft/revise L130 Experts/Consultants: Draft cover letter to Rick McCluskey re. retainer of services.	0.10	JO	\$120.00	\$12.00
05/31/2023	Service	A108 Communicate (other external) L410 Fact Witnesses: Phone conference with P.I. Rick McCluskey re gathering fact witnesses.	0.50	JO	\$120.00	\$60.00
06/05/2023	Service	A104 Review/analyze L110 Fact Investigation/Development: Review of criminal trial transcript of Luann Will, reading for relevant information and credibility.	0.50	CJD	\$250.00	\$125.00
06/06/2023	Service	A108 Communicate (other external) L110 Fact Investigation/Development: Phone conference with Private Investigator.	0.20	JO	\$120.00	\$24.00
06/06/2023	Service	A108 Communicate (other external) L440 Other Trial Preparation and Support: Review witness statements in preparation for call with Private Investigator/Call with Private Investigator	0.50	SHB	\$300.00	\$150.00
06/16/2023	Service	Exchange and review correspondences with OC re Sgt Boll's request to be absent from trial	0.30	OEO	\$350.00	\$105.00
06/16/2023	Service	Review similar cases and jury verdict research; review draft of FAQ chart prepared in anticipation of trial	2.30	OEO	\$350.00	\$805.00
06/16/2023	Service	A103 Draft/revise L110 Fact Investigation/Development: Draft FAQ chart to organize/memorize facts in prep for trial.	0.40	JO	\$120.00	\$48.00

06/19/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Review/add to FAQ in preparation for trial	0.80	SHB	\$300.00	\$240.00
06/19/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Review P.I. email and draft sworn statement for neighbor witness	0.40	SHB	\$300.00	\$120.00
06/20/2023	Service	A104 Review/analyze L250 Other Written Motions and Submissions: Review Defs motion to adjourn trial; review OC email re mediation/settlement	0.20	SHB	\$300.00	\$60.00
06/20/2023	Service	Telephone conference with OC re Defs request for adjournment, settlement, and other case administration matters	0.40	OEO	\$350.00	\$140.00
06/20/2023	Service	Review Def's motion for trial adjournment and related correspondence	0.40	OEO	\$350.00	\$140.00
06/21/2023	Service	A104 Review/analyze L110 Fact Investigation/ Development: Review medical billing records from Aurora, Froedtert, and Trillium Health Care for damages assessment	0.60	JO	\$120.00	\$72.00
06/21/2023	Service	A105 Communicate (in firm) L120 Analysis/Strategy: Internal discussion re. anticipated demand	0.30	JO	\$120.00	\$36.00
06/21/2023	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Review and revise draft of brief in opposition to Defendant's motion to adjourn the trial	0.80	OEO	\$350.00	\$280.00
06/21/2023	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Review and revise reply IOO to motion to adjourn trial	0.50	SHB	\$300.00	\$150.00
06/21/2023	Service	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Drafted demand letter to city, reciting facts of the case and distinguishing certain analogous circumstances. Included brief review of pleadings and discovery to get relevant facts and damages.	2.00	CJD	\$250.00	\$500.00
06/21/2023	Service	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Continued draft of demand letter, revising the factual summary and adding more detail to the damages sustained up to this point.	1.00	CJD	\$250.00	\$250.00
06/21/2023	Service	A103 Draft/revise L430 Written Motions and Submissions: Drafted memorandum in opposition of Defendants' motion to reschedule the trial, includes brief time spent looking into facts of when we became aware of the issue and what Defendants' have done regarding scheduling up to this point.	2.00	CJD	\$250.00	\$500.00
06/21/2023	Service	A102 Research L430 Written Motions and Submissions: Researching the standard for adjournment in federal court,	0.50	CJD	\$250.00	\$125.00

		reviewing cases that discuss the "good-cause" standard of FRCP 16(b).				
06/21/2023	Service	A106 Communicate (with client) L160 Settlement/Non-Binding ADR: Phone call with Client re City's motion to adjourn and settlement authority	0.10	SHB	\$300.00	\$30.00
06/22/2023	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Reviewed and finalized memorandum in opposition of Defendants' motion to reschedule trial.	0.50	CJD	\$250.00	\$125.00
06/22/2023	Service	A103 Draft/revise L160 Settlement/Non-Binding ADR: Draft email correspondence to Client re follow up on motion to oppose adjournment and settlement authority	0.30	SHB	\$300.00	\$90.00
06/22/2023	Service	A103 Draft/revise L160 Settlement/Non-Binding ADR: Revision of demand letter to city of milwaukee - recited facts as they relate to the legal claims instead of in narrative form. Reviewed summary judgment order and brief to get supporting facts/theory.	2.30	CJD	\$250.00	\$575.00
06/22/2023	Service	A108 Communicate (other external) L140 Document/File Management: Call with Renew Counseling to follow up on billing records.	0.10	JO	\$120.00	\$12.00
06/22/2023	Service	A104 Review/analyze L110 Fact Investigation/Development: Review billing records from Renew Counseling and add into Medical Billing spreadsheet to further assess damages.	0.40	JO	\$120.00	\$48.00
06/28/2023	Service	Research: Look up the entirety of Client's criminal convictions to prepare for drafting of Motion in Limine.	0.30	JO	\$120.00	\$36.00
06/29/2023	Service	A105 Communicate (in firm) L190 Other Case Assessment, Development and Administration: Conversation with Sydney regarding the facts of the case and our general theories of liability against officers and the city of Milwaukee.	0.40	CJD	\$250.00	\$100.00
07/05/2023	Service	Research: Research - A review and analysis of federal and Wisconsin case law on the evidentiary standards for admissibility of prior criminal convictions or acts in civil cases.	4.00	SW	\$120.00	\$480.00
07/06/2023	Service	Research: Research - A review and analysis of federal and Wisconsin case law on the evidentiary standards for admissibility of prior criminal convictions or acts in civil cases.	4.00	SW	\$120.00	\$480.00
07/07/2023	Service	A110 Manage data/files L140 Document/File Management: Create binder including expert reports and deposition transcripts as requested by Atty SHB.	1.00	JO	\$120.00	\$120.00
07/10/2023	Service	Draft: A summary of our client Joseph Walker's past convictions - work with Joey to gather these if you need assistance.	2.00	SW	\$120.00	\$240.00

		An analysis applying your research to Mr. Walker's convictions and whether or not they would be admitted into evidence if the City tried to introduce them at trial.				
07/17/2023	Service	A106 Communicate (with client) P280 Other: Call to Client regarding mediation.	0.10	JO	\$120.00	\$12.00
07/17/2023	Service	A104 Review/analyze L120 Analysis/Strategy: Review discovery documents and continue drafting Frequently Asked Questions chart to optimize organization of facts.	0.50	JO	\$120.00	\$60.00
07/18/2023	Service	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Draft status letter to client regarding mediation.	0.20	JO	\$120.00	\$24.00
07/18/2023	Service	A108 Communicate (other external) L410 Fact Witnesses: Phone conference with private investigator (RM) to solidify sworn statement of fact witness who lives in Florida.	0.30	JO	\$120.00	\$36.00
07/25/2023	Service	A107 Communicate (other outside counsel) L110 Fact Investigation/Development: Phone conference with private investigator re. obtaining sworn statement.	0.10	JO	\$120.00	\$12.00
07/25/2023	Service	A108 Communicate (other external) L110 Fact Investigation/Development: Communication and inquiry with potential private investigators in Winter Haven FL to obtain sworn statement of fact witness.	0.30	JO	\$120.00	\$36.00
07/26/2023	Service	A108 Communicate (other external) L410 Fact Witnesses: Communication with potential PI to explain the services we are seeking in order to obtain the sworn statement of a fact witness living out of state in Winter Haven, FL.	0.20	JO	\$120.00	\$24.00
08/08/2023	Service	Conference with Outside party: Phone conference with Florida PI re. status of obtaining signed affidavit of Jomar Hernandez	0.10	JO	\$120.00	\$12.00
08/08/2023	Service	Research - FRCP for Walker	2.00	SW	\$120.00	\$240.00
08/10/2023	Service	A108 Communicate (other external) L410 Fact Witnesses: Attempted communication with Mr. Jomar Hernandez, potential fact witness	0.10	JO	\$120.00	\$12.00
08/14/2023	Service	A108 Communicate (other external) L410 Fact Witnesses: Attempted communication with Mr. Jomar Hernandez, potential fact witness	0.10	JO	\$120.00	\$12.00
08/14/2023	Service	A103 Draft/revise L210 Pleadings: draft witness list/pretrial disclosure of lay witnesses for further attorney review.	0.80	JO	\$120.00	\$96.00
08/14/2023	Service	Redraft the demand letter to City	1.00	OEO	\$350.00	\$350.00
08/14/2023	Service	Draft: Demand letter to city outlining analogous cases and	2.50	CJD	\$250.00	\$625.00

		their verdict/settlements, formatting the same. Included review of overall structure and flow and revising as necessary.				
08/14/2023	Service	A104 Review/analyze L110 Fact Investigation/ Development: review and analyze discovery materials, including case-scene photographs and inventory reports of the MPD, add to analysis of documents.	1.20	JO	\$120.00	\$144.00
08/14/2023	Service	A103 Draft/revise L160 Settlement/Non-Binding ADR: Revision of settlement demand to send city, including brief research into attorneys fees in similarly situated cases.	0.60	CJD	\$250.00	\$150.00
08/14/2023	Service	Draft: Finalize demand letter	1.40	OEO	\$350.00	\$490.00
08/22/2023	Service	A108 Communicate (other external) L110 Fact Investigation/Development: Phone call with Florida private investigator.	0.10	JO	\$120.00	\$12.00
08/24/2023	Service	A103 Draft/revise L410 Fact Witnesses: Continue drafting Plaintiff's witness list, including the addition of Defendant officers.	1.20	JO	\$120.00	\$144.00
08/24/2023	Service	Review pertrial witness list and make edits	1.00	OEO	\$350.00	\$350.00
08/25/2023	Service	A108 Communicate (other external) L330 Depositions: Communicate with expert Brian Landers to schedule deposition dates.	0.20	JO	\$120.00	\$24.00
08/25/2023	Service	A103 Draft/revise L420 Expert Witnesses: Continue drafting plaintiff's witness list,	0.40	JO	\$120.00	\$48.00
08/25/2023	Service	A105 Communicate (in firm) L410 Fact Witnesses: Internal communication with Atty SHB re. witness list and pre-trial reports.	0.20	JO	\$120.00	\$24.00
08/28/2023	Service	Manage Data/Files: Download and organize correspondence with Florida PI regarding sworn statement of Jomar Hernandez.	0.10	JO	\$120.00	\$12.00
08/28/2023	Service	A102 Research L440 Other Trial Preparation and Support: Research regarding pre-trial reports and witness list rules to ensure accordance with Eastern District of WI Local rules.	0.20	JO	\$120.00	\$24.00
08/28/2023	Service	A107 Communicate (other outside counsel) L410 Fact Witnesses: Communication with Florida PI regarding attempted contact with fact witness Jomar Hernandez	0.10	JO	\$120.00	\$12.00
09/01/2023	Service	Research: Research regarding ability to subpoena potential witness out of state, including review of FRCP Rule 45 and case law's discussion of issuing subpoena outside of 100 mile range. Explored alternatives to acquiring testimony including FRCP 32.	1.30	CJD	\$250.00	\$325.00
09/07/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Create an anticipated exhibit list to prepare	1.20	JO	\$120.00	\$144.00

		for pretrial/ trial. compile and link exhibits to list for optimal organization.				
09/11/2023	Service	A108 Communicate (other external) L330 Depositions: Communicate with OC re. Brian Landers deposition-Zoom information	0.10	JO	\$120.00	\$12.00
09/11/2023	Service	A108 Communicate (other external) L330 Depositions: Email to Expert Brian Landers with remote deposition instructions for upcoming deposition.	0.10	JO	\$120.00	\$12.00
09/12/2023	Service	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Draft mediation statement, including the procedural posture analysis and compile anticipated exhibits.	1.00	JO	\$120.00	\$120.00
09/13/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: create agenda for internal trial-prep meetings.	0.40	JO	\$120.00	\$48.00
09/13/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: schedule internal trial-prep meetings	0.20	JO	\$120.00	\$24.00
09/14/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: schedule/rearrange internal trial-prep meetings	0.10	JO	\$120.00	\$12.00
09/15/2023	Service	A108 Communicate (other external) L330 Depositions: Communicate with expert witness Brian Landers re. deposition	0.20	JO	\$120.00	\$24.00
09/18/2023	Service	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Draft of mediation statement.	1.20	CJD	\$250.00	\$300.00
09/19/2023	Service	A103 Draft/revise L160 Settlement/Non-Binding ADR: Draft of mediation statement for review by Sam and Emil, included review of relevant pleadings and earlier demand letter for comparable verdicts.	2.00	CJD	\$250.00	\$500.00
09/19/2023	Service	A103 Draft/revise L160 Settlement/Non-Binding ADR: Finalizing mediation statement including review of some exhibits and proposing list of exhibits to attach to partners.	0.80	CJD	\$250.00	\$200.00
09/19/2023	Service	A103 Draft/revise L160 Settlement/Non-Binding ADR: Finalizing mediation statement along with pertinent submissions of relevant pleadings and case materials for mediator's review	2.40	OEO	\$350.00	\$840.00
09/20/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Review file and update FAQ chart for optimal case fact organization	0.50	JO	\$120.00	\$60.00
09/20/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Review binders and create list of what has already been printed for this case.	0.30	JO	\$120.00	\$36.00

09/20/2023	Service	Compile: Compile necessary exhibits for mediation statement, edit mediation statement to reflect inclusion of exhibits, review mediation statement for grammar/formatting, internal discussion re. exhibits	2.00	JO	\$120.00	\$240.00
09/20/2023	Service	Revise and edit mediation statement and review submitted documents to mediator	2.20	OEO	\$350.00	\$770.00
09/20/2023	Service	A103 Draft/revise L160 Settlement/Non-Binding ADR: Review and edit of mediation statement, including review of relevant pleadings and correction of certain footnotes.	1.00	CJD	\$250.00	\$250.00
09/20/2023	Service	A104 Review/analyze L160 Settlement/Non-Binding ADR: Review of applicable exhibits for mediation statement to ensure each are included and have the proper names.	0.40	CJD	\$250.00	\$100.00
09/20/2023	Service	A104 Review/analyze L160 Settlement/Non-Binding ADR: Final review of mediation statement before being sent to partners, included review of exhibit dropbox link and finding relevant pages for deposition testimony to include.	0.70	CJD	\$250.00	\$175.00
09/20/2023	Service	A104 Review/analyze L160 Settlement/Non-Binding ADR: Final review of mediation statement for grammar and punctuation, sent to mediation office.	0.40	CJD	\$250.00	\$100.00
09/21/2023	Service	A108 Communicate (other external) L140 Document/File Management: Attempted communication to mediator's office re. location of mediation.	0.10	JO	\$120.00	\$12.00
09/21/2023	Service	Compile: Organize and compile printed case documents to optimize trial preparation organization	0.80	JO	\$120.00	\$96.00
09/21/2023	Service	A106 Communicate (with client) L140 Document/File Management: Communication with Client re. mediation details, including location, time, etc.	0.10	JO	\$120.00	\$12.00
09/25/2023	Service	A101 Plan and prepare for L160 Settlement/Non-Binding ADR: Plan for upcoming mediation, including creating physical binders of mediation exhibits and statement.	0.60	JO	\$120.00	\$72.00
09/25/2023	Service	A108 Communicate (other external) L420 Expert Witnesses: Communication with expert regarding upcoming trial prep meeting and mediation	0.10	JO	\$120.00	\$12.00
09/26/2023	Service	A104 Review/analyze L160 Settlement/Non-Binding ADR: Review and compile all necessary pleadings and docs in preparation for mediation	3.20	OEO	\$350.00	\$1,120.00
09/27/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Draft pre-trial report	2.00	JO	\$120.00	\$240.00
09/27/2023	Service	A108 Communicate (other external) L420 Expert Witnesses: Communicate with expert witnesses regarding status of mediation	0.10	JO	\$120.00	\$12.00

09/27/2023	Service	A109 Appear for/attend L160 Settlement/Non-Binding ADR: Attend mediation	4.00	OEO	\$350.00	\$1,400.00
09/27/2023	Service	A109 Appear for/attend L160 Settlement/Non-Binding ADR: Attend mediation	4.00	SHB	\$300.00	\$1,200.00
09/28/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Continue drafting pre-trial report, including list of witnesses, proposed voir dire, proposed jury instructions, proposed special verdict form	3.00	JO	\$120.00	\$360.00
09/28/2023	Service	Review Dr. Beth's report and documents; Confernce call with Dr. Beth to prep her for trial	2.50	OEO	\$350.00	\$875.00
09/28/2023	Service	Review Expert Lander's report; Telephone conference with Expert witness to prep him for upcoming deposition	1.50	OEO	\$350.00	\$525.00
09/28/2023	Service	Appear/Attend: Attend pre-deposition meeting with OEO and our expert Brian Landers	1.00	JO	\$120.00	\$120.00
09/28/2023	Service	Appear/Attend: Attend trial prep meeting with OEO & Beth Brant-our medical expert.	1.80	JO	\$120.00	\$216.00
09/28/2023	Service	A105 Communicate (in firm) L410 Fact Witnesses: Internal communication regarding retaining local private investigator who also speaks Spanish	0.10	JO	\$120.00	\$12.00
09/28/2023	Service	Email/Phone Call: Call different private investigations companies to inquire about whether they have any Spanish speaking PIs.	0.40	DG	\$120.00	\$48.00
09/28/2023	Service	Email/Phone Call: Email to team regarding PI research.	0.20	DG	\$120.00	\$24.00
09/29/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Draft proposed motions in limine	0.70	JO	\$120.00	\$84.00
09/29/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Update FAQ chart with relevant information, including position officers.	0.30	JO	\$120.00	\$36.00
09/29/2023	Service	A108 Communicate (other external) L130 Experts/Consultants: Communication with medical expert, Beth Brant	0.20	JO	\$120.00	\$24.00
09/29/2023	Service	A109 Appear for/attend L340 Expert Discovery: Attend/Defend deposition of Brian Landers	2.30	SHB	\$300.00	\$690.00
09/29/2023	Service	A104 Review/analyze L340 Expert Discovery: Review Landers expert report ahead of deposition	0.50	SHB	\$300.00	\$150.00
10/01/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Begin trial preparation and drafts of pretrial submissions, including review of file/discovery, and drafting jury instructions, compiling exhibits, identifying witnesses.	5.80	SHB	\$300.00	\$1,740.00

10/01/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Draft and compile pre trial filings	7.00	OEO	\$350.00	\$2,450.00
10/02/2023	Service	A103 Draft/revise L110 Fact Investigation/Development: Draft radiology records request to Froedtert Hospital, including authorization	0.20	JO	\$120.00	\$24.00
10/02/2023	Service	Draft and finalize pre trial report, jury instructions, voir dire questions, and research and draft motion in limine	7.60	OEO	\$350.00	\$2,660.00
10/02/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Assist with drafting of pre-trial report, including briefing various motions in limine (excluding expert, excluding certain photograph, etc.). Review and finalizing of jury instructions and voir dire questions.	6.00	CJD	\$250.00	\$1,500.00
10/02/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Draft pre-trial filings, compile exhibits	6.00	JO	\$120.00	\$720.00
10/03/2023	Service	A106 Communicate (with client) L440 Other Trial Preparation and Support: Communication with Client re. pre-trial filings	0.10	JO	\$120.00	\$12.00
10/03/2023	Service	A109 Appear for/attend L230 Court Mandated Conferences: Attend scheduling conference with court	0.30	OEO	\$350.00	\$105.00
10/03/2023	Service	A103 Draft/revise TR130 Document/File Management: Draft letter to court re. trial rescheduling	0.10	JO	\$120.00	\$12.00
10/03/2023	Service	A102 Research L440 Other Trial Preparation and Support: Research into Defendants' motions in limine to provide appropriate objections and supporting arguments.	1.30	CJD	\$250.00	\$325.00
10/03/2023	Service	A108 Communicate (other external) L440 Other Trial Preparation and Support: Communicate with expert witnesses regarding potential new trial dates	0.20	JO	\$120.00	\$24.00
10/05/2023	Service	A104 Review/analyze L160 Settlement/Non-Binding ADR: Review Rule 60 pleadings from City (250k); Compose correspondence to OC acknowledging the offer; Draft correspondence to client advising of the offer	0.60	OEO	\$350.00	\$210.00
10/05/2023	Service	A103 Draft/revise L460 Post-Trial Motions and Submissions: Response to City's motions in limine, including brief research and review of cases Defendants cite.	4.80	CJD	\$250.00	\$1,200.00
10/06/2023	Service	A104 Review/analyze L430 Written Motions and Submissions: Review CJD draft of response to DefMIL	1.20	SHB	\$300.00	\$360.00
10/09/2023	Service	A103 Draft/revise L330 Depositions: draft cover letter enclosing deposition invoice of liability expert Brian Landers to City	0.10	JO	\$120.00	\$12.00
10/09/2023	Service	A103 Draft/revise P280 Other: draft cover letter to city atty re. supplemental expert witness list	0.10	JO	\$120.00	\$12.00

10/09/2023	Service	Analyze and review transcript of Deposition testimony of Expert witness- Brian Landers	2.10	OEO	\$350.00	\$735.00
10/09/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Analyze City's objections and responses to Plaintiff's Motion in Limine	0.80	OEO	\$350.00	\$280.00
10/09/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Draft and revise Plaintiff's objections to City's Motion in limine	2.40	OEO	\$350.00	\$840.00
10/09/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Revised objections to Defendants' MILs, including brief research into evidentiary effect of certain motions and arguments against.	2.50	CJD	\$250.00	\$625.00
10/09/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Finalized and filed objections to Defendants' MILs.	0.50	CJD	\$250.00	\$125.00
10/09/2023	Service	A104 Review/analyze L250 Other Written Motions and Submissions: Final Review of Objections to MILL	0.50	SHB	\$300.00	\$150.00
10/09/2023	Service	A103 Draft/revise L330 Depositions: draft cover letter enclosing Brian Landers' expert deposition invoice to the city	0.10	JO	\$120.00	\$12.00
10/10/2023	Service	A104 Review/analyze L330 Depositions: Review deposition transcript of Brian Landers and summarize relevant information	0.50	JO	\$120.00	\$60.00
10/11/2023	Service	A105 Communicate (in firm) L440 Other Trial Preparation and Support: Internal communication and file review regarding stipulated trial facts	0.20	JO	\$120.00	\$24.00
10/11/2023	Service	A108 Communicate (other external) L440 Other Trial Preparation and Support: Communication with Clerk of court re. number of deposition transcript copies	0.10	JO	\$120.00	\$12.00
10/11/2023	Service	A108 Communicate (other external) L440 Other Trial Preparation and Support: Communication with Cream City Reporting re. obtaining sealed deposition transcripts	0.10	JO	\$120.00	\$12.00
10/11/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Draft and revise proposed stipulations	2.00	OEO	\$350.00	\$700.00
10/12/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Draft 32 trial witness subpoenas for further atty review.	1.00	JO	\$120.00	\$120.00
10/12/2023	Service	A104 Review/analyze L330 Depositions: Review and analyze deposition transcript of Brian Landers, summarize relevant information.	1.00	JO	\$120.00	\$120.00
10/13/2023	Service	Compile: Compile trial exhibits, organize and label numerically	0.80	JO	\$120.00	\$96.00

10/13/2023	Service	A102 Research L440 Other Trial Preparation and Support: Brief research in local and federal rules of civil procedure governing pre-trial supplementation	0.30	JO	\$120.00	\$36.00
10/13/2023	Service	Compile: Compile disclosure documents, including IA interview transcriptions and medical records	0.30	JO	\$120.00	\$36.00
10/13/2023	Service	A104 Review/analyze L110 Fact Investigation/ Development: Review file and supplement FAQ chart	0.50	JO	\$120.00	\$60.00
10/14/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Trial Prep- Prepare for drafting cross examination questions for Def. Prucelli; Review depo transcripts, incident reports, and other pertinent exhibits to prepare examination draft questions	7.00	OEO	\$350.00	\$2,450.00
10/15/2023	Service	Prepare for pretrial hearing by reviewing briefs and pre trial filings and summarizing oral arguments	2.00	OEO	\$350.00	\$700.00
10/16/2023	Service	Compile: Compile pleadings, pre-trial reports, expert reports, and anticipated exhibits and sent to Atty Cade via Dropbox for further review.	0.30	JO	\$120.00	\$36.00
10/16/2023	Service	A104 Review/analyze L330 Depositions: Review and analyze deposition transcript of Brian Landers and summarize relevant information	1.00	JO	\$120.00	\$120.00
10/16/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Pre-trial conference via Zoom	2.00	SHB	\$300.00	\$600.00
10/16/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Pre-trial conference via Zoom	2.00	OEO	\$350.00	\$700.00
10/17/2023	Service	A108 Communicate (other external) L120 Analysis/ Strategy: Summarize MIL rulings; note to file	0.80	SHB	\$300.00	\$240.00
10/17/2023	Service	A107 Communicate (other outside counsel) L230 Court Mandated Conferences: Communication and scheduling with OC re. court-mandated meet and confer.	0.20	JO	\$120.00	\$24.00
10/17/2023	Service	A104 Review/analyze L330 Depositions: Review and analyze deposition transcript of Brian Landers, summarize relevant information	0.70	JO	\$120.00	\$84.00
10/18/2023	Service	A104 Review/analyze L120 Analysis/Strategy: Review mirandized interview conducted on 4/7/14 and answer SHB's questions	1.00	JO	\$120.00	\$120.00
10/18/2023	Service	A104 Review/analyze L140 Document/File Management: Review of interrogation videos of client, including gathering information from the video as to its timing, location, and who was present.	1.30	CJD	\$250.00	\$325.00
10/19/2023	Service	A104 Review/analyze L330 Depositions: Complete analyze/ summary of relevant deposition testimony of Brian Landers	0.80	JO	\$120.00	\$96.00

10/19/2023	Service	Travel: Travel to Courthouse to obtain pertinent criminal trial records.	0.40	JO	\$120.00	\$48.00
10/20/2023	Service	A110 Manage data/files L140 Document/File Management: Sort, organize, and save criminal trial records	0.30	JO	\$120.00	\$36.00
10/20/2023	Service	Compile: Compile necessary videos for transcription, communication with Cream City re. requested service	0.30	JO	\$120.00	\$36.00
10/22/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Prepare for trial by reviewing depo transcripts and associated materials for Tana Boll; Begin drafting examination questions for witness	6.80	OEO	\$350.00	\$2,380.00
10/24/2023	Service	A107 Communicate (other outside counsel) L140 Document/File Management: Communication with Cream City reporting regarding requested transcriptions	0.10	JO	\$120.00	\$12.00
10/24/2023	Service	Attend meet and confer with City re outstanding motion in limine issues	1.50	OEO	\$350.00	\$525.00
10/24/2023	Service	A102 Research L440 Other Trial Preparation and Support: Research applicability of Res Judicata/Collateral Estoppel as it relates to prior criminal convictions in 1983 cases; research issue of waiver of affirmative defenses	4.00	OEO	\$350.00	\$1,400.00
10/24/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Review incident reports from police reports and location/id of inventoried items.	2.00	OEO	\$350.00	\$700.00
10/24/2023	Service	Attend meet and confer with City re outstanding motion in limine issues	1.50	SHB	\$300.00	\$450.00
10/27/2023	Service	A103 Draft/revise L210 Pleadings: Draft, finalize, and file letter to the court regarding extension of time to file joint report on MIL and outstanding issues	0.30	AB	\$120.00	\$36.00
10/30/2023	Service	Continue trial prep by reviewing docs and transcriptions of Interviews	3.00	OEO	\$350.00	\$1,050.00
11/01/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Prepare for trial by reviewing key pieces of evidence and potential evidentiary issues	4.00	OEO	\$350.00	\$1,400.00
11/01/2023	Service	Plan/Prepare: Prepare for trial via discussion with trial consultant, review of key issues to bring up for key witnesses, discussion of theme of the case.	4.00	CJD	\$250.00	\$1,000.00
11/01/2023	Service	A103 Draft/revise L310 Written Discovery: Draft of discovery shell for remaining limited discovery of city's expert.	0.40	CJD	\$250.00	\$100.00
11/01/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Prepare for trial by reviewing key pieces of evidence and potential evidentiary issues	4.00	SHB	\$300.00	\$1,200.00

11/02/2023	Service	A103 Draft/revise L430 Written Motions and Submissions: Review OC email re outstanding MIL issues/ review pretrial reports/MILs and respond to outstanding issues in preparation of conference call with OC; research federal motion for reconsideration standard and draft motion	2.10	SHB	\$300.00	\$630.00
11/03/2023	Service	Email/Phone Call: Call wit OC re meet and confer MIL issues; draft status letter to court re resolutions	0.90	SHB	\$300.00	\$270.00
11/03/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Revise trial witness subpoenas and draft cover letters to subpoenas and send to SHB and OEO for final review.	3.50	AB	\$120.00	\$420.00
11/03/2023	Service	A103 Draft/revise L330 Depositions: Draft, finalize, and send out notice of deposition for Todd Gray	0.50	AB	\$120.00	\$60.00
11/06/2023	Service	A104 Review/analyze L250 Other Written Motions and Submissions: Review of city's motion in limine no 12.	0.30	CJD	\$250.00	\$75.00
11/07/2023	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Draft brief in response to city's MIL 12, including research, case review, and revisions of the language drafted.	4.80	CJD	\$250.00	\$1,200.00
11/08/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Finalize trial subpoenas and send out 14 to process server for service	3.30	AB	\$120.00	\$396.00
11/08/2023	Service	Research issues of collateral estoppel, necessity of and timing of pleading affirmative defenses and other related issues in preparation for drafting response to Def's motion in limine to preclude evidence on collateral estoppel grounds	6.50	OEO	\$350.00	\$2,275.00
11/08/2023	Service	A104 Review/analyze L250 Other Written Motions and Submissions: Review Defs MIL 12 and compiled exhibits and research	1.60	SHB	\$300.00	\$480.00
11/08/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Review/approve subpoena drafts to serve.	0.50	SHB	\$300.00	\$150.00
11/08/2023	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Draft of response to City's MIL 12, including brief research and review of City's arguments and cited cases.	2.00	CJD	\$250.00	\$500.00
11/09/2023	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Revise/draft/finalize response brief to Defs DIL 12	2.60	SHB	\$300.00	\$780.00
11/09/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Trial prep meeting in firm	3.00	SHB	\$300.00	\$900.00
11/09/2023	Service	A103 Draft/revise P400 Initial Document Preparation/ Filing: Continued draft of brief in opposition of City's	2.90	CJD	\$250.00	\$725.00

		MIL 12, included collateral estoppel research and review of OEO's findings.				
11/10/2023	Service	A103 Draft/revise P400 Initial Document Preparation/ Filing: Reviewed files to prepare a diagram of the incident, using police reports and case photographs to obtain accurate measurements.	2.00	CJD	\$250.00	\$500.00
11/10/2023	Service	Plan/Prepare: Prepare Mailing and Subpoenas to be sent via certified mail	0.60	TD	\$120.00	\$72.00
11/13/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Pull all of defendants' exhibits	2.00	AB	\$120.00	\$240.00
11/13/2023	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Finalize MIL 13	0.50	SHB	\$300.00	\$150.00
11/13/2023	Service	A103 Draft/revise L250 Other Written Motions and Submissions: Prepared motion in limine to limit scope of City's expert witness, included research and review of correspondence between parties.	2.70	CJD	\$250.00	\$675.00
11/13/2023	Service	A103 Draft/revise P400 Initial Document Preparation/ Filing: Prepared declaration to accompany motion, proceeded with filing motion and supporting papers.	1.00	CJD	\$250.00	\$250.00
11/14/2023	Service	A110 Manage data/files L190 Other Case Assessment, Development and Administration: Request skip trace for Eustolic Caralampio-Alvarado and Karen Dubis	0.30	AB	\$120.00	\$36.00
11/14/2023	Service	Manage Data/Files: Downloaded and saved recent pleadings to file.	0.20	CJD	\$250.00	\$50.00
11/14/2023	Service	A108 Communicate (other external) L190 Other Case Assessment, Development and Administration: Communicate with MKE fire department who received trial subpoena, communicated such with OEO and SHB.	0.30	CJD	\$250.00	\$75.00
11/14/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Begin review of Defendants proposed exhibits to determine admissibility and redactability	5.50	OEO	\$350.00	\$1,925.00
11/15/2023	Service	A110 Manage data/files L140 Document/File Management: Compile all documents relating to Jennifer Gates and Renew Counseling and create Dropbox for Gates review of records	0.40	AB	\$120.00	\$48.00
11/16/2023	Service	Telephone conference with Jennifer Gates re her testimony	0.50	OEO	\$350.00	\$175.00
11/16/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Trial Prep with Atty.Ovbiagele and Atty. Cade	3.00	SHB	\$300.00	\$900.00
11/17/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Trial Prep with Atty. Baker and Atty. Cade	3.00	OEO	\$350.00	\$1,050.00

11/17/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Continue preparing for trial by compiling list of undisputed and material facts	4.00	OEO	\$350.00	\$1,400.00
11/17/2023	Service	A107 Communicate (other outside counsel) L130 Experts/Consultants: Call with Beth Brant regarding travel itinerary and questions for attorneys and send follow up email to attorneys regarding questions	0.40	AB	\$120.00	\$48.00
11/17/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Compile police subpoenas and Jomar Hernandez subpoenas and send out for service/certified mail	1.90	AB	\$120.00	\$228.00
11/17/2023	Service	Plan/Prepare: Prepare and Enter mail tracking for Notice of Room Change & Subpoenas	1.00	TD	\$120.00	\$120.00
11/19/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Review expert reports; review depositions in preparation for trial, drafting opening/examinations	3.90	SHB	\$300.00	\$1,170.00
11/20/2023	Service	A110 Manage data/files L390 Other Discovery: Compile all documents related to Todd Gray's testimony	0.40	AB	\$120.00	\$48.00
11/20/2023	Service	A103 Draft/revise P400 Initial Document Preparation/ Filing: Create witness subpoena update chart and draft letter to update courtroom for SHB/OEO review	1.00	AB	\$120.00	\$120.00
11/20/2023	Service	A103 Draft/revise L210 Pleadings: Draft letter to court regarding Dr. Sadie's virtual testimony for SHB/OEO review	0.30	AB	\$120.00	\$36.00
11/20/2023	Service	A109 Appear for/attend L250 Other Written Motions and Submissions: Attend status conference with Court via Zoom on outstanding Motions in Limine	2.00	SHB	\$300.00	\$600.00
11/20/2023	Service	A105 Communicate (in firm) L440 Other Trial Preparation and Support: Team meeting to discuss outcome of status conference; delegate assignments re court orders	0.80	SHB	\$300.00	\$240.00
11/20/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Create Defendants' Trial Exhibit binders for OEO and SHB	2.00	AB	\$120.00	\$240.00
11/20/2023	Service	A109 Appear for/attend L250 Other Written Motions and Submissions: Attend status conference with Court via Zoom on outstanding Motions in Limine	2.00	OEO	\$350.00	\$700.00
11/20/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Research Heck and Gilbert issues as instructed by court; Review and analyze criminal trial transcript re issue preclusion issue; Begin drafting response brief for MIL on preclusion	7.00	OEO	\$350.00	\$2,450.00
11/21/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Update criminal trial transcript day 2 and update	0.40	AB	\$120.00	\$48.00

		binders				
11/21/2023	Service	A108 Communicate (other external) L420 Expert Witnesses: Call with expert Beth Brandt re trial prep	0.50	SHB	\$300.00	\$150.00
11/21/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Prepare relevant pleadings binders for OEO and SHB	0.80	AB	\$120.00	\$96.00
11/21/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Draft and finalize update to witnesses regarding courtroom change and send out.	1.00	AB	\$120.00	\$120.00
11/21/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Compile all pretrial documents and create trial binder for OEO and SHB	1.00	AB	\$120.00	\$120.00
11/21/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Compile all witness examination materials and create trial binders for OEO and SHB	2.00	AB	\$120.00	\$240.00
11/21/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Continue preparing for trial by drafting witness questions and going through relevant exhibits	9.40	OEO	\$350.00	\$3,290.00
11/22/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Compile all documents for our exhibits, stamp, and create exhibit binders for court.	5.00	AB	\$120.00	\$600.00
11/22/2023	Service	A110 Manage data/files L440 Other Trial Preparation and Support: Prepare trial exhibits for filing and file with the court and update all binders with relevant recent pleadings	2.00	AB	\$120.00	\$240.00
11/22/2023	Service	Email/Phone Call: Phone call with Karen Dubis re witness prep	1.10	SHB	\$300.00	\$330.00
11/22/2023	Service	Review: Review and update proposed trial exhibits and file amended Plaintiff's exhibit list	1.40	OEO	\$350.00	\$490.00
11/22/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Review and analyze Court's order re MIL #12	0.20	OEO	\$350.00	\$70.00
11/22/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Continue preparing for trial by drafting and editing witness examination questions/selecting areas of inquiry	6.80	OEO	\$350.00	\$2,380.00
11/22/2023	Service	Meeting with witness Haitza Rosado	0.50	SHB	\$300.00	\$150.00
11/23/2023	Service	A104 Review/analyze L440 Other Trial Preparation and Support: Review and analyze Defs Motion to quash subpoena (Jeff Norman)	0.20	OEO	\$350.00	\$70.00
11/23/2023	Service	A103 Draft/revise L440 Other Trial Preparation and Support: Continue preparing for trial by: reviewing expert report of Beth Brant and underlying source documents	7.50	OEO	\$350.00	\$2,625.00

		reviewed as part of expert opinion; Select pertinent areas of inquiry for examination of Dr. Brant; Begin drafting examination questions for other non-defendant officers designated as witnesses in def's pre-trial report and witness list; Review and analyze incident reports pertaining to these officers; Draft outlines for potential trial themes and case theories to aide in case presentation and examinations				
11/24/2023	Service	Plan/Prepare: Prep witness examinations; prep meeting with client for trial	6.50	SHB	\$300.00	\$1,950.00
11/24/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Review motion designating portions of video of Walker's custodial interrogation; Review, analyze and watch the entirety of Walker's interrogation video to analyze portions designated by Defs and to review additional portions for completeness	2.50	OEO	\$350.00	\$875.00
11/24/2023	Service	Continue drafting questions for potential officer witnesses (non-defendants).	2.30	OEO	\$350.00	\$805.00
11/24/2023	Service	Review proposed jury instructions and special interrogatories and verdict form; Review 7th circuit form instructions; Research and draft arguments against the City's proposed special interrogatories	2.30	OEO	\$350.00	\$805.00
11/24/2023	Service	Review proposed jury instructions and special interrogatories and verdict form; Review 7th circuit form instructions; Research and draft arguments against the City's proposed special interrogatories	2.30	OEO	\$350.00	\$805.00
11/25/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Start draft opening statement; brainstorm theme; review of exhibits/discovery	4.20	SHB	\$300.00	\$1,260.00
11/25/2023	Service	Revise trial schedule and order of witnesses; Arrange sequence of exhibits for use for witnesses for the first couple of days of trial	1.50	OEO	\$350.00	\$525.00
11/25/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Continue preparing for trial by addressing and teasing out key points for each witness; Review and analyze Walker's deposition transcript; Review and analyze Purcelli, Boll and Mahay's deposition transcript and prior trial testimony and IA interviews; Review and analyze expert (Brian Landers) deposition transcript	6.80	OEO	\$350.00	\$2,380.00
11/25/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Complete witness examinations; finalize opening statement draft	4.00	SHB	\$300.00	\$1,200.00
11/26/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: In office trial prep; finalize binders; work on opening statement; review juror list	4.90	SHB	\$300.00	\$1,470.00
11/26/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation	5.50	OEO	\$350.00	\$1,925.00

		and Support: Continue to finalize preparation for upcoming trial by finalizing drafts of examination questions for Prucelli, Boll, Urban, Ritkowski and Lopez				
11/26/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Begin drafting closing arguments and laying out outline, theme, hooks, and theories	3.20	OEO	\$350.00	\$1,120.00
11/27/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Trial	9.00	SHB	\$300.00	\$2,700.00
11/27/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: review deposition transcripts; work on examinations for 11/28 witness roster	2.10	SHB	\$300.00	\$630.00
11/27/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Day 1 of 5 of Trial- Jury Selection, opening examination, examination of witnesses	9.00	OEO	\$350.00	\$3,150.00
11/27/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Prepare for Day 2 of 5 of trial by summarizing testimony from Day 1, and laying out outline for examinations of expected witnesses for Day 2	2.00	OEO	\$350.00	\$700.00
11/28/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Trial Day 1	9.00	AB	\$120.00	\$1,080.00
11/28/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend trial day 2	4.50	AB	\$120.00	\$540.00
11/28/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend trial day 2	9.00	SHB	\$300.00	\$2,700.00
11/28/2023	Service	Appear/Attend: Attend jury trial, assist with exhibit organization and jury impression to communicate with attorneys of record.	8.00	CJD	\$250.00	\$2,000.00
11/28/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend trial day 3	9.00	AB	\$120.00	\$1,080.00
11/28/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Day 2 of 5 of the trial: Witness examinations	9.00	OEO	\$350.00	\$3,150.00
11/28/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Prepare for Day 3 of 5 of trial- Summarize testimonies and exhibits received on Day 2 of the trial; Preview and outline testimony of upcoming witnesses for Day 3 of trial	3.00	OEO	\$350.00	\$1,050.00
11/29/2023	Service	Appear/Attend: Attend trial to assist with exhibit tracking and juror impressions to communicate with attorneys of record.	4.00	CJD	\$250.00	\$1,000.00
11/29/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend trial day 3	9.00	SHB	\$300.00	\$2,700.00

11/29/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Day 3 of trial: Examination of witnesses	9.00	OEO	\$350.00	\$3,150.00
11/29/2023	Service	A101 Plan and prepare for L450 Trial and Hearing Attendance: Prepare for Day 4 of 5 of the trial, including finalizing testimony examination of the State's proposed witnesses (including Officer Urban and Ritkowski); Review jury instructions and pertinent laws and Graham factors and verdict form in preparation for JI and verdict form conference	3.50	OEO	\$350.00	\$1,225.00
11/29/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Day 4 of 5 of trial	9.00	OEO	\$350.00	\$3,150.00
11/30/2023	Service	Appear/Attend: Attend jury trial, assist with organizing exhibits and jury attention.	8.00	CJD	\$250.00	\$2,000.00
11/30/2023	Service	A103 Draft/revise L190 Other Case Assessment, Development and Administration: Draft recap of each witness I was present for, for OEO's review in preparing closing statement.	1.00	CJD	\$250.00	\$250.00
11/30/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend trial day 4	9.00	SHB	\$300.00	\$2,700.00
11/30/2023	Service	A101 Plan and prepare for L440 Other Trial Preparation and Support: Compile trial notes/summary for closing argument	0.90	SHB	\$300.00	\$270.00
11/30/2023	Service	Prepare for Day 5 of trial; Continue drafting and finalizing closing argument; Review key summaries of witness testimony; Begin creation of slides to aide in the presentation of closing arguments;	4.50	OEO	\$350.00	\$1,575.00
12/01/2023	Service	Appear/Attend: Attend trial to assist with exhibit tracking and juror impressions to communicate with attorneys of record.	3.40	CJD	\$250.00	\$850.00
12/01/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend trial day 5	6.00	SHB	\$300.00	\$1,800.00
12/01/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Day 5 of trial: Jury Instructions and Closing Arguments	3.00	OEO	\$350.00	\$1,050.00
12/01/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend Day 5 of trial; Address jury questions and verdict	3.50	OEO	\$350.00	\$1,225.00
12/01/2023	Service	Appear/Attend: Post-verdict discussions with the client advising on the next steps in the legal process	1.50	OEO	\$350.00	\$525.00
12/04/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend trial day 4	5.00	AB	\$120.00	\$600.00

12/04/2023	Service	A109 Appear for/attend L450 Trial and Hearing Attendance: Attend trial day 5	6.00	AB	\$120.00	\$720.00
12/05/2023	Service	Begin preparing materials for submission in support of the fee petition under sec. 1988 including drafting Atty. Ovbiagele's declaration; Review of pertinent legal factors applicable to the court's deliberation on the fee petition	2.40	OEO	\$350.00	\$840.00
12/11/2023	Service	Finalize documents for submission in support of fee petition request	1.20	OEO	\$325.00	\$390.00
					Services Subtotal	\$223,864.00

Expenses

Date	Type	Description	Quantity	Rate	Total
05/18/2022	Expense	E119 Experts: Brian Landers Expert Retainer Fee	1.00	\$1,000.00	\$1,000.00
06/03/2022	Expense	Medical Records from Trillium Care Group	1.00	\$55.41	\$55.41
06/03/2022	Expense	Medical Records from Renew Counseling	1.00	\$26.00	\$26.00
06/16/2022	Expense	Cancellation of Gonzales Deposition	1.00	\$110.00	\$110.00
06/21/2022	Expense	Medical Records from Milwaukee House of Corrections	1.00	\$144.95	\$144.95
06/21/2022	Expense	Medical Records from Dodge Correctional Institution	1.00	\$35.70	\$35.70
06/24/2022	Expense	E119 Experts: Landers Expert Fees (Less Retainer Fee of \$1,000)	1.00	\$1,025.00	\$1,025.00
10/25/2022	Expense	Deposition of Daniel Clifford Cream City Reporting, LLC Invoice Date: 10/25/2022 Invoice No.: 3061	1.00	\$687.10	\$687.10
10/26/2022	Expense	Deposition of Balbir Mahay Cream City Reporting, LLC Invoice Invoice Date: 10/25/2022 Invoice No.: 3082	1.00	\$610.85	\$610.85
11/01/2022	Expense	Expert Fees: Testifying Expert Retainer - Center Point Consulting SH-1	1.00	\$1,000.00	\$1,000.00
11/03/2022	Expense	Boll Deposition Cancellation Fee	1.00	\$110.00	\$110.00
11/15/2022	Expense	E115 Deposition transcripts: Deposition of Jeremy Gonzalez Cream City Reporting Invoice No. 3211	1.00	\$636.55	\$636.55

Invoice Date: 11/14/2022					
11/29/2022	Expense	Expert Fees: Maki Expert Location Fee - Psychological Expert	1.00	\$650.00	\$650.00
Invoice: SH-2					
Invoice Date: 11/28/2022					
12/13/2022	Expense	E119 Experts: Expert Fee - Dr. Beth Brant	1.00	\$3,550.00	\$3,550.00
Center Point Consulting, LLC Invoice #SH-3					
Date: 12/13/2022					
12/28/2022	Expense	E115 Deposition transcripts: Deposition of Joseph Walker	1.00	\$396.55	\$396.55
Veritext Invoice No. 6256655					
Invoice Date: 12/23/2022					
12/29/2022	Expense	Deposition of Lisa Purcelli	1.00	\$613.70	\$613.70
Cream City Invoice NO. 3235					
Invoice Date: 11/16/2022					
12/30/2022	Expense	Medical Records: Renew Counseling Medical Records	1.00	\$26.00	\$26.00
01/03/2023	Expense	Expert Fees: Landers Expert Fee	1.00	\$8,775.00	\$8,775.00
01/10/2023	Expense	E119 Experts: Dr. James Black- Psychological Review of Joseph Walker; including review of medical records, clinical consults, and preliminary summary compilation.	5.00	\$160.00	\$800.00
Date of Invoice: 1/10/23					
01/11/2023	Expense	E108 Postage: 1/11 Certified Mail to Dr. Black re: Invoice Check	1.00	\$4.60	\$4.60
01/11/2023	Expense	E115 Deposition transcripts: Deposition of Tanya Boll	1.00	\$778.95	\$778.95
Cream City Reporting, LLC Invoice No. 3533					
Date of Invoice: 1/11/2023					
02/28/2023	Expense	E124 Other: Cream City 2014 Internal Affairs Interview Transcriptions	1.00	\$614.00	\$614.00
Cream City Invoice No.: 3789					
Cream City Job No.: 2870					
03/01/2023	Expense	E119 Experts: Brian Landers Final Report Invoice	1.00	\$3,450.00	\$3,450.00
Invoice No.: 22-004					
Paid for with OVB check No. 6276					
03/09/2023	Expense	Court Reporter: Corporate Designee Deposition - Cancellation Fee	1.00	\$110.00	\$110.00

03/30/2023	Expense	E115 Deposition transcripts: Audio Recording Transcription of Boll and Gonzalez	1.00	\$942.94	\$942.94
04/05/2023	Expense	E108 Postage: 4.5 Certified mail to Landers re Check for invoice Tracking No. 70200640000128344241 Check no 6276	1.00	\$4.60	\$4.60
05/31/2023	Expense	E120 Private investigators: Date of Check: 5/31/23 Date check was sent: 5/31/23 Check Number: 6299 Pay to the order to: Wisconsin Investigative Services, LLC \$500	1.00	\$500.00	\$500.00
08/01/2023	Expense	E120 Private investigators: Menge Consulting & Investigative Services LLC - Florida PI. witness affidavit	1.00	\$400.00	\$400.00
08/15/2023	Expense	E108 Postage: 8.15 Certified Mail : Demand Letter to City of Milwaukee, P.O. Lisa Purcelli, P.O. Tanya Boll, P.O. Balbir Mahay, P.O. Jeremy Gonzalez, PO Daniel Clifford Attn: Anthony Jackson, Assistant City Attorney Tracking No: 70221670000313458162	1.00	\$5.10	\$5.10
10/02/2023	Expense	E121 Arbitrators/mediators: Emile Banks Mediation Fee	1.00	\$918.75	\$918.75
10/04/2023	Expense	E119 Experts: Brian Landers Deposition prep invoice	1.00	\$1,350.00	\$1,350.00
10/10/2023	Expense	Expert Fees: Brian Landers Deposition Prep Invoice 2	1.00	\$450.00	\$450.00
10/12/2023	Expense	E115 Deposition transcripts: 2x Copies of Deposition Transcripts for Balbir Mahay, Daniel Clifford, Jeremy Gonzalez, Lisa Purcelli, Tanya Boll	1.00	\$68.00	\$68.00
10/16/2023	Expense	E115 Deposition transcripts: Deposition of Brian Landers	1.00	\$491.55	\$491.55
10/16/2023	Expense	E119 Experts: Expert Beth Brant Trial Prep, Additional Review, and Update Report	1.00	\$1,250.00	\$1,250.00
10/19/2023	Expense	E101 Copying: Walker criminal trial records, including certified copies of all trial transcripts, MILs, witness lists, jury questions, stipulations, etc.	1.00	\$742.50	\$742.50
10/27/2023	Expense	Video and Audio Transcriptions from Cream City of Walker's interviews, 911 call, and other misc. videos - Check No. 6367	1.00	\$1,407.00	\$1,407.00
11/10/2023	Expense	E108 Postage: 11.10 Certified Mail - Subpoenas Tracking - Check No: Colleen Crowe: 9589 0710 5270 0717 5596 07 - 6343 Terri Deroon: 9589 0710 5270 0717 5595 91 - 6348 Kristine Hoiland: 9589 0710 5270 0717 5595 60 - 6345 Sarah Ticcioni: 9589 0710 5270 0717 5652 64 - 6347 Codner Panna: 9589 0710 5270 0717 5595 53 - 6344 Jill Mundson: 9589 0710 5270 0717 5595 77 - 6346	6.00	\$5.01	\$30.06
11/15/2023	Expense	Karen Dubis trial subpoena fee - check no. 6334	1.00	\$55.20	\$55.20

11/16/2023	Expense	E120 Private investigators: Skip trace on Eustolic Caralampio-Alvarado and Karen Dubis	1.00	\$40.00	\$40.00
11/16/2023	Expense	Process Service: Trial Witness Subpoena Service	1.00	\$1,125.00	\$1,125.00
11/17/2023	Expense	Jomar Hernandez Witness Fee - WI Certified Mail (check No. 6383)	1.00	\$46.29	\$46.29
11/17/2023	Expense	Haitza Rosado Witness Fee (check no. 6341)	1.00	\$46.42	\$46.42
11/17/2023	Expense	Joe Alvio Jr Witness Fee (check no. 6339)	1.00	\$46.94	\$46.94
11/17/2023	Expense	Maribeth Sadie Witness Fee (check no. 6321)	1.00	\$50.22	\$50.22
11/17/2023	Expense	E108 Postage: 11.17 Certified Mail - Subpoenas Tracking - #Check No: Jomar Hernandez (Lakeland, FL): 9589 0710 5270 0717 5597 99 - #6368 Jomar Hernandez (Milwaukee, WI): 9589 0710 5270 0717 5598 05 - #6383 Brad Houston: 9589 0710 5270 0717 5597 82 - #6377 Jeffrey B Norman: 9589 0710 5270 0717 5597 68 - #6378 Kevin Bolyard: 9589 0710 5270 0717 5597 75 - #6376	5.00	\$5.01	\$25.05
11/21/2023	Expense	Mail Expense: Overnight mail to Timothy Lietzke for Witness Subpoena (Tracking No. EI670029784US)	1.00	\$28.75	\$28.75
11/21/2023	Expense	E108 Postage: 11.21 Priority Mail to Witnesses re Courtroom Update Karen Dubis (Courtroom Update & Supoena) Tracking #: 9505 5124 8638 3325 4324 26 Jomar (WI Address) Tracking #: 9505 5124 8638 3325 4324 40 Brad Houston Tracking #: 9505 5124 8638 3325 4324 64 David Pola. Tracking #: 9505 5124 8638 3325 4324 88 Jomar (FL) Tracking #: 9505 5124 8638 3325 4325 01 Jeff Norman: Tracking #: 9505 5124 8638 3325 4325 25 Kevin Bolyard Tracking #: 9505 5124 8638 3325 4325 63 Joseph A. Walker Tracking #: 9505 5124 8638 3325 4325 87	1.00	\$86.50	\$86.50
12/04/2023	Expense	Brian Landers Trial Appearance	1.00	\$9,774.22	\$9,774.22

12/04/2023	Expense	Expert Fees: Beth Brant Expert Trial Fees	1.00	\$9,282.25	\$9,282.25
				Expenses Subtotal	\$54,377.70
				Subtotal	\$278,241.70
				Total	\$278,241.70

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3363	12/24/2023	\$278,241.70	\$0.00	\$278,241.70
			Outstanding Balance	\$278,241.70
			Amount of Initial Advanced Fee	\$0.00
			Total Amount Outstanding	\$278,241.70

Please make all amounts payable to: OVB Law & Consulting, S.C.

Please pay within 10 days. 2.0% simple annual interest will be charged every 30 days.

OVB Law & Consulting, S.C.

INVOICE

826 N Plankinton Ave, Suite 600
Milwaukee, Wisconsin 53203
Phone: 414-585-0588
Fax: 414-255-3031
Email: emil@ovblaw.com
www.ovblaw.com

Invoice # 3363
Date: 12/14/2023
Due On: 12/24/2023



Pay your invoice online

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Or, [click here](#) if you're viewing on a computer or smartphone.